APPENDIX H-5

River Water Use

91-20-2 (1/89)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

State Pollutant Discharge Elimination System (SPDES)

DISCHARGE PERMIT

Special Conditions (Part I)

Industrial Code: 9999
Discharge Class (CL): 01
Toxic Class (TX): N
Major Drainage Basin: 13
Sub Drainage Basin: 01
Water Index Number: H
Compact Area:

SPDES Number: NY-0006033
DEC Number: 2-6205-00041/00001-0
Effective Date (EDP): 05/01/99
Expiration Date (ExDP): [redacted]
Modification Date(s): / /
Attachment(s): General Conditions (Part II) Date: 11/90

This SPDES permit is issued in compliance with Title 8 of Article 17 of the Environmental Conservation Law of New York State and in compliance with the Clean Water Act as amended, (33 U.S.C. Section 1251 et. seq.)(hereafter referred to as "the Act").

PERMITTEE NAME AND ADDRESS

Attention: Alan Reiss

Name: The Port Authority of NY & NJ
Street: One World Trade Center - 72E
City: New York State: NY Zip Code: 10048
is authorized to discharge from the facility described below:

FACILITY NAME AND ADDRESS

Name: World Trade Center
Location (C,T,V): New York (C) County: New York
Facility Address: One World Trade Center
City: New York State: NY Zip Code: 10048
NYTM - E: 588.3 NYTM - N: 4507
From Outfall No.: 001 at Latitude: 40° 42' 50" & Longitude: 74° 00' 50"
into receiving waters known as: Hudson River Class: I
and, (list other Outfalls, Receiving Waters & Water Classifications)
002 - Hudson River - Class I

in accordance with the effluent limitations, monitoring requirements and other conditions set forth in Special Conditions (Part I) and General Conditions (Part II) of this permit.

DISCHARGE MONITORING REPORT (DMR) MAILING ADDRESS

Mailing Name: The Port Authority of NY & NJ, World Trade Department
Street: One World Trade Center, 68W
City: New York State: NY Zip Code: 10048
Responsible Official or Agent: Alan Reiss Phone: (212)435-8501

This permit and the authorization to discharge shall expire on midnight of the expiration date shown and the permittee shall not discharge after the expiration date unless this permit has been renewed, or extended pursuant to law. To be authorized to discharge beyond the expiration date, the permittee shall apply for a permit renewal no less than 180 days prior to the expiration date shown above.

DISTRIBUTION: R. Newman, P.E., NYSDEC
Hon. R. Giuliani, Mayor of NYC
NYC DOH & DEP
Interstate Sanitation Commission
NYS DEC Div. of Water, BWCP
NYS DEC Div. of Water, BWP

Permit Administrator: John J. Ferguson
Regional Permit Administrator
Address: 47-40 21st Street, 2nd Floor
Long Island City, NY 11101
Signature: [signature] Date: 04/12/99

FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning EDP (01/27/99)

and lasting until EDP + 5 YEARS (01/27/04)

the discharges from the permitted facility shall be limited and monitored by the permittee as specified below:

Outfall Number & Effluent Parameter	Discharge Limitations Daily Avg	Daily Max.	Units	Minimum Monitoring Requirements Measurement Frequency	Sample Type
001, 002 - Air Conditioning, Computer Cooling and Seal Pump Water [3]					
Flow	Monitor	Monitor	MGD	Continuous	Pump Log
Discharge Temperature	Monitor	91	°F	Continuous	Recorder
Intake-Discharge Temperature Difference	Monitor	17	°F	Daily	Calculation
Total Residual Chlorine[4]	Monitor	0.2	mg/l	3 times per week	4 Equally spaced grab samples per sampling event during periods of chlorination
pH[5]	Monitor	Monitor	SU	2/month	Grab

[4] Total Residual Chlorine shall not be discharged more than two hours per unit per day. There shall not be simultaneous chlorination of separable portions in a single unit or more than one unit at one time.

[5] The intake pH range shall not be extended more than 0.1 pH unit

Additional Requirements

1. The permit application must list all the corrosion/scale inhibitors or biocidal-type compounds used by the permittee. No other compounds may be used. If use of new boiler/cooling water additives is intended, application must be made prior to use.

2. Intake velocity at each fixed and/or traveling screen and at the first set of bar racks shall not exceed 1.8 F.P.S.

3 Only one discharge line (001 or 002) may be operated at a time. Simultaneous use of Outfalls 001 and 002 is not allowed

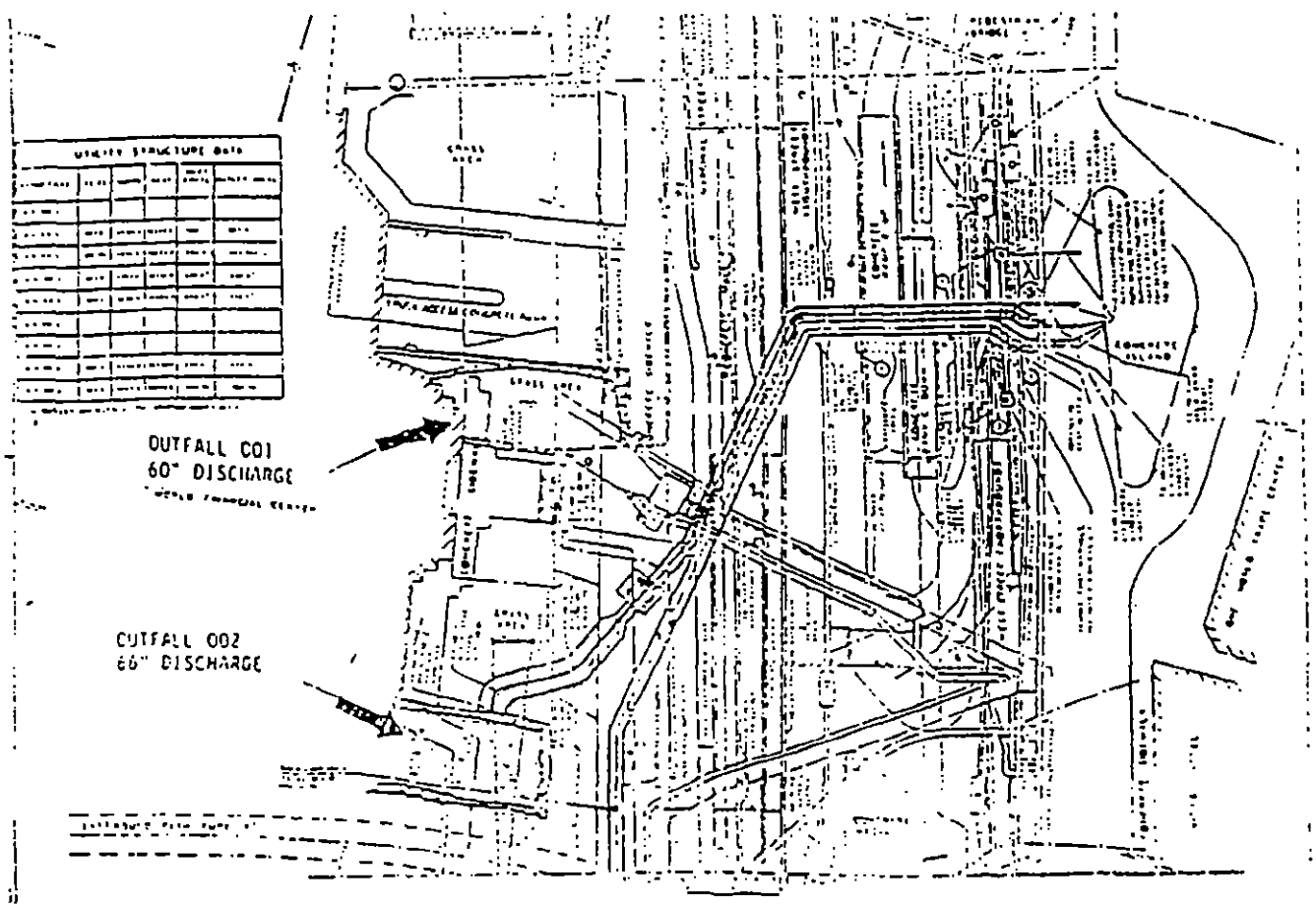
DEFINITIONS OF DAILY AVERAGE AND DAILY MAXIMUM

The daily average discharge is the total discharge by weight or in other appropriate units as specified herein, during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges in appropriate units as specified herein divided by the number of days during the calendar month when measurements were made.

The daily maximum discharge means the total discharge by weight or in other appropriate units as specified herein, during any calendar day.

MONITORING LOCATIONS

The permittee shall take samples and measurements, to comply with the monitoring requirements specified in this permit, at the location(s) indicated below: (Show sampling locations and outfalls with sketch or flow diagram as appropriate) For 001 and 002, at basement 2 level in the valve room, prior to discharge to the Hudson River.



DISCHARGE NOTIFICATION REQUIREMENTS

(a) Except as provided in (c), (f) and (g) of these Discharge Notification Act requirements, the *permittee shall install and maintain identification signs at all outfalls to surface waters listed in* this permit. Such signs shall be installed within 90 days of the Effective Date of this Modification.

(b) Subsequent modifications to or renewal of this permit does not reset or revise the deadline set forth in (a) above, unless a new deadline is set explicitly by such permit modification or renewal.

(c) *The Discharge Notification Requirements described herein do not apply to outfalls from which* the discharge is composed exclusively of storm water, or discharges to ground water.

(d) The sign(s) shall be conspicuous, legible and in as close proximity to the point of discharge as is reasonably possible while ensuring the maximum visibility from the surface water and shore. The signs shall be installed in such a manner to pose minimal hazard to navigation, bathing or other water related activities. *If the public has access to the water from the land in the vicinity of the outfall, an identical sign shall be posted to be visible from the direction approaching the* surface water.

The signs shall have minimum dimensions of eighteen inches by twenty four inches (18" x 24") and shall have white letters on a green background and contain the following information:

(e) For each discharge required to have a sign in accordance with a), the permittee shall, concurrent with the installation of the sign, provide a repository of copies of the Discharge Monitoring Reports (DMRs), as required by the RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS page of this permit. This repository shall be open to the public, at a minimum, during normal daytime business hours. The repository may be at the business office repository of the permittee or at an off-premises location of its choice (such location shall be the village, town, city or county clerk's office, the local library or other *location as approved by the Department). In accordance with the* RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS page of your permit, each DMR shall be maintained on record for a period of three years.

(continued)

(f) If, upon November 1, 1997, the permittee has installed signs that include the information required by 17-0815-a(2)(a) of the ECL, but do not meet the specifications listed above, the permittee may continue to use the existing signs for a period of up to five years, after which the signs shall comply with the specifications listed above.

(g) All requirements of the Discharge Notification Act, including public repository requirements, are waived for any outfall meeting any of the following circumstances, provided Department notification is made in accordance with (h):

(i) such sign would be inconsistent with any other state or federal statute;

(ii) the Discharge Notification Requirements contained herein would require that such sign could only be located in an area that is damaged by ice or flooding due to a one-year storm or storms of less severity;

(iii) instances in which the outfall to the receiving water is located on private or government property which is restricted to the public through fencing, patrolling, or other control mechanisms. Property which is posted only, without additional control mechanisms, does not qualify for this provision;

(iv) instances where the outfall pipe or channel discharges to another outfall pipe or channel, before discharge to a receiving water; or

(v) instances in which the discharge from the outfall is located in the receiving water, two-hundred or more feet from the shoreline of the receiving water.

(h) If the permittee believes that any outfall which discharges wastewater from the permitted facility meets any of the waiver criteria listed in (g) above, notification (form enclosed) must be made to the Department's Bureau of Water Permits, Central Office, of such fact, and, provided there is no objection by the Department, a sign and DMR repository for the involved outfall(s) are not required. This notification must include the facility's name, address, telephone number, contact, permit number, outfall number(s), and reason why such outfall(s) is waived from the requirements of discharge notification. The Department may evaluate the applicability of a waiver at any time, and take appropriate measures to assure that the ECL and associated regulations are complied with.

(i) The permittee shall periodically inspect the outfall identification signs in order to ensure that they are maintained, are still visible and contain information that is current and factually correct.

SCHEDULE OF COMPLIANCE

a) The permittee shall comply with the following schedule.

Action Code	Outfall Number(s)	Compliance Action	Due Date
	001	Permittee shall provide written notice to the Department of the proposed commencement of chlorination.	Prior to commence-ment of chlorination
	001	Permittee shall submit a report describing alternate methods to control biofouling of heat exchangers. Mechanical cleaning and periodic chlorination must be considered. Details of automatic feed systems and dechlorination systems to ensure discharge of chlorine within permit limits, must be considered.	Six months after initiation of chlorination

b) The permittee shall submit a written notice of compliance or non-compliance with each of the above schedule dates no later than 14 days following each elapsed date, unless conditions require more immediate notice under terms of the General Conditions (Part II), Section 5. All such compliance or non-compliance notification shall be sent to the locations listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS. *Each notice of non-compliance shall include the following* information:

1. A short description of the non-compliance;
2. A description of any actions taken or proposed by the permittee to comply with the elapsed schedule requirements without further delay and to limit environmental impact associated with the non-compliance;
3. A description or any factors which tend to explain or mitigate the non-compliance; and
4. An estimate of the date the permittee will comply with the elapsed schedule requirement and an assessment of the probability that the permittee will meet the next scheduled requirement on time.

c) The permittee shall submit copies of any document required by the above schedule of compliance to NYSDEC Regional Water Engineer at the location listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS, unless otherwise specified in this permit or in writing by the Department.

RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS

a) The permittee shall also refer to the General Conditions (Part II) of this permit for additional information concerning monitoring and reporting requirements and conditions.

b) The monitoring information required by this permit shall be summarized, signed and retained for a period of three years from the date of the sampling for subsequent inspection by the Department or its designated agent. Also;

[X] (If box is checked) monitoring information required by this permit shall be summarized and reported by submitting completed and signed Discharge Monitoring Report (DMR) forms for each 1 month reporting period to the locations specified below. Blank forms are available at the Department's Albany office listed below. The first reporting period begins on the effective date of this permit and the reports will be due no later than the 28th day of the month following the end of each reporting period.

Send the original (top sheet) of each DMR page to:

Department of Environmental Conservation
Division of Water
Bureau of Watershed Compliance Programs
50 Wolf Road
Albany, New York 12233-3506

Phone: (518) 457-3790

Send the first copy (second sheet) of each DMR page to:

Department of Environmental Conservation
Regional Water Engineer
Region 2
1 Hunter Point Plaza
47-40 21st Street
Long Island City, New York 11101

c) A monthly "Wastewater Facility Operation Report..." (form 92-15-7) shall be submitted (if box is checked) to the [ ] Regional Water Engineer and/or [ ] County Health Department or Environmental Control Agency listed above.

d) Noncompliance with the provisions of this permit shall be reported to the Department as prescribed in the attached General Conditions (Part II).

e) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.

f) If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculations and recording on the Discharge Monitoring Reports.

g) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit.

h) Unless otherwise specified, all information recorded on the Discharge Monitoring Report shall be based upon measurements and sampling carried out during the most recently completed reporting period.

i) Any laboratory test or sample analysis required by this permit for which the State Commissioner of Health issues certificates of approval pursuant to section five hundred two of the Public Health Law shall be conducted by a laboratory which has been issued a certificate of approval. Inquiries regarding laboratory certification should be sent to the Environmental Laboratory Accreditation Program, New York State Health Department Center for Laboratories and Research, Division of Environmental Sciences, The Nelson A. Rockefeller State Plaza, Albany, New York 12201.

waiver.wpd(12/98)

NOTICE OF WAIVER

Pursuant To The Discharge Notification Act
Environmental Conservation Law 17-0815-a

This form must be used if you wish to notify the New York State Department of Environmental Conservation (DEC) that you believe one or more outfalls listed on your SPDES permit can be waived from the requirements of the Discharge Notification Act (DNA).

INSTRUCTIONS:

1. Please note that the DNA applies only to discharges of *wastewater* to *surface* water, and DOES NOT APPLY to the following situations:
   - Discharges consisting of storm water only (not mixed with wastewater or otherwise contaminated).
   - Discharges to ground water

   If the discharge in question is to ground water, or consists of storm water *only*, an outfall sign and data repository are not required, and *it is not necessary to submit a Notice of Waiver*.

2. If your facility or commercial establishment holds more than one SPDES permit issued by the DEC, and waivers are claimed for outfalls under multiple permits, a separate Notice of Waiver form must be completed for the outfall(s) listed under EACH permit. All Notice of Waiver forms will be considered independent of each other.

3. More than one outfall may be listed on a Notice of Waiver form. However, separate Notice of Waiver forms must be used if any single criterion used as the basis for waiver does not apply to all outfalls.

4. If you believe that the outfall(s) discharging from your facility or commercial establishment meets any of the waiver criteria listed on page 2, indicate so with a check mark in the appropriate box(es).

5. Discharge description(s) and outfall number(s) can be obtained from the SPDES permit.

6. When complete, send the second page only of this Notice of Waiver to: New York State Department of Environmental Conservation, Bureau of Water Permits, Room 314, 50 Wolf Road, Albany, NY 12233.

7. When a Notice of Waiver is received, a letter acknowledging receipt by the DEC will be sent to you. The Notice of Waiver will be evaluated by the DEC's Regional Water Engineer to ensure that the DEC concurs with the justification(s) indicated for the waiver. The Notice of Waiver remains effective *unless* you are notified otherwise by the DEC.

NOTICE OF WAIVER

Pursuant To The Discharge Notification Act
Environmental Conservation Law 17-0815-a

In accordance with 17-0815-a(2)(a) of the Environmental Conservation Law, notice is hereby given that, to the best of my knowledge, the outfall(s) discharging from the facility described below meets one or more requirements for waiver from the Discharge Notification Act (DNA), as indicated below:

- ☐ A sign would be inconsistent with any other state or federal statute.
- ☐ A sign must be located in an area that is damaged by ice or flooding during a one-year storm, or storms of less severity.
- ☐ The outfall is located on private or government property (circle as appropriate) which is restricted to the public through fencing, patrolling, or other control mechanisms (posting only, without additional control mechanisms, does not qualify for this provision).
- ☐ The outfall pipe or channel discharges to another outfall pipe or channel, before discharge to a receiving water.
- ☐ The outfall is located two-hundred or more feet from the shoreline of the receiving water.

Permit Number: NY_____

Company Name: _____

Contact Name: _____

Contact Address _____

Contact Telephone: _____

Discharge Description (storm water, industrial wastewater, sanitary wastewater, commercial wastewater, other):

_____

Outfall Number(s). _____

Certification:

I understand that completing and sending this Notice of Waiver does not guarantee a final determination of waiver from the DNA. This Notice of Waiver will be reviewed by the Regional Water Engineer and, provided the New York State Department of Environmental Conservation does not object, the outfall(s) described above is/are waived from all requirements of the DNA (including sign posting and monitoring data repository).

_____ _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM (SPDES)
DISCHARGE PERMIT

GENERAL CONDITIONS
(PART II)

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1. GENERAL PROVISIONS

This permit, or a true copy, shall be kept readily available for reference at the wastewater treatment facility.

b. A determination has been made on the basis of a submitted application, plans, or other available information, that compliance with the specified permit provisions will reasonably protect classified water use and assure compliance with applicable water quality standards. Satisfaction of permit provisions notwithstanding, if operation pursuant to the permit causes or contributes to a condition in contravention of State water quality standards, or if the Department determines, on the basis of notice provided by the permittee and any related investigation, inspection or sampling, that a modification of the permit is necessary to prevent impairment of the best use of the waters or to assure maintenance of water quality standards or compliance with other provisions of ECL Article 17 or the Act, the Department may require such a modification and may require abatement action to be taken by the permittee and may also prohibit the noticed act until the permit has been modified.

c All discharges authorized by this permit shall be consistent with the terms and conditions of this permit. Facility expansion or other modifications, production increases, product changes, product process modifications, and wastewater collection, treatment and disposal system changes which will result in new or increased discharges of pollutants into the waters of the state must be reported by submission of a new SPDES application, in which case the permit may be modified accordingly. The discharge of any pollutant, not identified and authorized, or the discharge of any pollutant more frequently than, or at a level in excess of, that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Facility modifications, process modifications, or production decreases which result in decreased discharges of pollutants must be reported by submission of written notice to the permit-issuing authority, in which case the permit-issuing authority may require the permittee to submit a new SPDES application.

d The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

If the discharge(s) permitted herein originate within the jurisdiction of an interstate water pollution control agency, then the permitted discharge(s) must also comply with any applicable effluent standards or water quality standards promulgated by that interstate agency.

f The permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Environmental Conservation Law and the Clean Water Act and is grounds for: enforcement action; for permit suspension, revocation and modification; and for denial of a permit renewal application.

g Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, the permittee shall promptly submit such facts or information.

h It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

i The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

j The Clean Water Act provides that any person who violates a permit condition implementing sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed $25,000 per day of such violations. Any person who willfully or negligently violates permit conditions implementing sections 301, 302, 306, 307, or 308 of the Clean Water Act is subject to a fine of not less than $5,000 nor more than $50,000 per day of violation, or by imprisonment for not more than three years, or both.

k The filing of a request by the permittee for a permit modification, revocation, transfer, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, suspending, or revoking this permit, or to determine compliance with this permit. The permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

m. Nothing in this permit relieves the permittee from a requirement to obtain other permits required by law, including, but not limited to:

(1) an air contamination source permit/certification under 6NYCRR Part 201;

(2) a waste transporter permit under 6NYCRR Part 364, or

(3) a radioactive waste discharge permit under 6NYCRR Part 380.

2. <u>SPECIAL REPORTING REQUIREMENTS FOR EXISTING MANUFACTURING, COMMERCIAL, MINING, AND SILVICULTURAL DISCHARGERS</u>

All existing manufacturing, commercial, mining and silvicultural dischargers must notify the Department as soon as they know or have reason to believe:

a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not specifically controlled in the permit pursuant to General Provision 1 (c) herein. For the purposes of this section, recurrent accidental or unintentional spills or releases shall be considered to be a discharge on a frequent basis.

b. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels"

(1) 500 micrograms/liter,

(2) 1.0 milligram/liter for antimony,

(3) five times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR §122.21(g)(7), or

(4) the level established by the Department in accordance with 40 CFR §122.44(f).

c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or by-product, any toxic pollutant which was not reported in the permit application under 40 CFR §122.21(g)(9) and which is being or may be discharged to waters of the State.

<u>EXCLUSIONS</u>

a. The issuance of this permit by the Department and the receipt thereof by the Applicant does not supersede, revoke or rescind an order or modification thereof [illegible] determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements contained in such order or modification thereof unless specifically intended [illegible].

The issuance of this permit does not convey any [illegible] either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations, nor does it obviate the necessity of obtaining the assent of any other jurisdiction as required by law for the discharge authorized.

This permit does not authorize or approve the [illegible] of any onshore or offshore physical structures or facilities or the undertaking of any work in any navigable waters.

[illegible] and hazardous substance liability. The [illegible] upon the institution of any legal action against the permittee under Section 311 of the Clean Water Act shall be in conformance with regulations promulgated pursuant to Section 311 governing the applicability of Section 311 of the Clean Water Act to discharges from facilities with NPDES permits.

<u>MODIFICATION, SUSPENSION, REVOCATION</u>

a. If the permittee fails or refuses to comply with any requirement in this permit, such noncompliance shall constitute a violation of the permit for which the Commissioner may modify, suspend, or revoke the permit after notice and opportunity for hearing and take direct enforcement action pursuant to law. When at any time during or prior to a period for compliance the permittee announces or otherwise lets it be known, or the Commissioner on reasonable cause determines, that the permittee will not make the requisite efforts to achieve compliance with an interim or final requirement, the Commissioner may modify, suspend or revoke the permit and take direct enforcement action pursuant to law without waiting for expiration of the period for compliance with such requirements.

b After notice and opportunity for a hearing, the Department may modify, suspend or revoke this permit in whole or in part during its term for cause including, but not limited to, the following:

(1) violation of any provision of this permit; or

(2) obtaining this permit by misrepresentation or failure to disclose fully all relevant facts at any time, or materially false or inaccurate statements or information in the application or the permit; or

(3) a change in any physical circumstances, requirements or criteria applicable to discharges,including, but not limited to

(i) standards for construction or operation of the discharging facility;

(ii) the characteristics of the waters into which such discharge is made,

(iii) the water quality criteria applicable to such is made,

(iv) the classification of such waters; or

(v) effluent limitations or other requirements applicable pursuant to the Act or State Law.

(4) a determination that the permitted activity endangers human health or the environment and can only be regulated to acceptable levels by permit modification, a suspension, or revocation.

(5) violation of any order of the Commissioner or provision of ECL or regulation promulgated thereunder, which is related to the permitted activity

(6) Newly discovered material information or material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of this permit

c If any applicable toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is promulgated under section 307(a) of the Clean Water Act for a toxic pollutant and that a standard or prohibition is more stringent than any limitation on the pollutant in the permit, the Department shall institute proceedings to modify the permit in order to achieve conformance with the toxic effluent standard or prohibition and in conformance with ECL 17-0809.

5 REPORTING NONCOMPLIANCE

a Anticipated noncompliance The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements

b Twenty-four hour reporting The permittee shall report any noncompliance which may endanger health or the environment Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances A written noncompliance report shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances The written noncompliance report shall contain a description of the noncompliance and its cause the period of noncompliance, including exact dates and times and if the noncompliance has not been corrected the anticipated time it is expected to continue, and steps taken or planned to reduce eliminate and prevent the noncompliance and its reoccurrence

(1) The following shall be included as information which must be reported within 24 hours under paragraph (b) above

(i) any unanticipated bypass which violates any effluent limitation in the permit

(ii) any upset which violates any effluent limitation in the permit

(iii) violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit to be reported within 24 hours

(iv) any unusual situation, caused by a deviation from normal operation or experience (e g upsets, bypasses, inoperative treatment process units, spills or illegal chemical discharges or releases to the collection system) which create a potentially hazardous condition

(v) any dry weather overflow(s)

(2) The Department may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

(3) Reports required by this section shall be filed with the Department's regional office having jurisdiction over the permitted facility. During weekends, oral noncompliance reports, required by this paragraph, may be made at (518) 457-7362.

c Other noncompliance. The permittee shall report all instances of noncompliance not otherwise required to be reported under this section or other sections of this permit, with each submitted copy of its Discharge Monitoring Reports until such noncompliance ceases. Such noncompliance reports shall contain the information listed in paragraph (b) of this section.

d Duty to mitigate. The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

5 INSPECTION AND ENTRY

The permittee shall allow the Commissioner of the Department, the EPA Regional Administrator, the County Health Department, or their authorized representatives, upon the presentation of credentials and other documents as may be required by law, to:

a enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

b have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, including records maintained for purposes of operation and maintenance;

c inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;

d sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act or Environmental Conservation Law, any substances or parameters at any location; and

e enter upon the property of any contributor of wastewater to the system under authority of the permittee's Sewer Use Ordinance (municipalities) or Regulations.

6 TRANSFER OF PERMIT

a A permit is transferable only with prior written approval of the Department.

b To transfer a permit to a new owner or operator, written application must be made to the Department. Application for Permit Transfer forms can be obtained from, and must be submitted to, the appropriate regional office of the Department's Division of Regulatory Affairs.

c In order for operation of the facility to continue without interruption, application must be made at least 30 days in advance of the transfer.

d If when the ownership or operation is transferred, the volume or composition of the facility discharge will be altered, a new application for permit may be required.

7 PERMIT RENEWAL

a Any permittee who wishes to continue to discharge after the expiration date of a permit shall apply for renewal of its permit no later than 180 days prior to the permit's expiration date (unless permission for a later date has been granted by the Department) by submitting any forms, fees, or supplemental information which may be required by the Department. Upon request, the Department shall provide the permittee with specific information concerning the forms, fees and supplemental information required.

b When a permittee has made timely and sufficient application for the renewal of a permit or a new permit with reference to any activity of a continuing nature, the existing permit does not expire until the application has been finally determined by the Department, and, in case the application is denied or the terms of the new permit limited, until the last day for seeking review of the Department order or a later date fixed by order of the reviewing court, provided that this subdivision shall not affect any valid Department action then in effect summarily suspending such permit.

c A municipality applying for a permit (renewal) shall submit evidence that it is enforcing an up-to-date enacted Sewer Use Ordinance which was approved by the Department.

d. A municipality applying for a permit (renewal) shall have an approved method of residuals disposal in compliance with Part 6-NYCRR 360 and 364.

e. A municipality receiving industrial waste shall submit evidence that it is operating (or implementing) its industrial pretreatment program in accordance with Part 6 NYCRR 651.53(l).

9 SPECIAL PROVISIONS - NEW OR MODIFIED DISPOSAL SYSTEMS OR SERVICE AREAS

a Prior to construction of any new or modified waste disposal system or modification of a facility or service area generating wastewater which could alter the design volume of, or the method or effect of treatment or disposing of the sewage, industrial waste or other wastes, from an existing waste disposal system, the Permittee shall submit to the Department or its designated field office for review, an approvable engineering report, plans, and specifications which have been prepared by a person or firm licensed to practice Professional Engineering in the State of New York.

b The construction of the above new or modified disposal system shall not start until the Permittee receives written approval of the system from the Department or its designated field office.

c The construction of the above new or modified disposal system shall be under the general supervision of a person or firm licensed to practice Professional Engineering in New York State. Upon completion of construction, that person or firm shall certify to the Department or its designated field office that the system has been fully completed in accordance with the approved engineering report, plans and specifications, permit and letter of approval; and the permittee shall receive written acceptance of such certificate from the Department or designated field agency prior to commencing discharge.

d The Department and its designated field offices review wastewater disposal system reports, plans, and specifications for treatment process capability only, and approval by either office does not constitute approval of the system's structural integrity.

10. MONITORING, RECORDING, AND REPORTING

10.1 GENERAL

a The permittee shall comply with all recording, reporting, monitoring and sampling requirements specified in this permit and such other additional terms, provisions, requirements or conditions that the Department may deem to be reasonably necessary to achieve the purposes of the Environmental Conservation Law, Article 17, the Act, or rules and regulations adopted pursuant thereto.

b Samples and measurements taken to meet the monitoring requirements specified in this permit shall be representative of the quantity and character of the monitored discharges. Composite samples shall be composed of a minimum of 6 grab samples collected over the specified collection period, either at a constant sample volume for a constant flow interval or at a flow-proportioned sample volume for a constant time interval, unless otherwise specified in Part I of this permit. For GC/MS Volatile Organic Analysis (VOA), aliquots must be combined in the laboratory immediately before analysis. At least 4 (rather than 8) aliquots or grab samples should be collected over the specified collection period. Grab sample means a single sample taken over a period not exceeding 15 minutes.

c Accessable sampling locations must be provided and maintained. New sampling locations shall be provided if existing locations are deemed unsuitable by the Department or its designated field agency.

d Actual measured values of all positive analytical results obtained above the Practical Quantitation Limit (PQL)[1] for all monitored parameters shall be recorded and reported, as required by this permit, except, where parameters are limited in this permit to values below the PQL, actual measured values for all positive analytical results above the Method Detection Limit (MDL)[2] shall be reported.

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1 Practical Quantitation Limit (PQL) is the lowest level that can be measured within specified limits of precision and accuracy during routine laboratory operations on most effluent matrices.

2 Method Detection Limit (MDL) is the level at which the analytical procedure referenced is capable of determining with a 99% probability that the substance is present. This value is determined in distilled water with no interfering substances present. The precision at this level is +/- 100%.

e. The permittee shall periodically calibrate and perform manufacturer's recommended maintenance procedures on all monitoring and analytical instrumentation to insure accuracy of measurements Verification of maintenance shall be logged into the daily record book(s) of the facility. The permittee shall notify the Department's regional office immediately if any required instrumentation becomes inoperable. In addition, the permittee shall verify the accuracy of their measuring equipment to the Department's Regional Office annually

f The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit, shall upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years per violation or by both If a conviction of such person is for a violation committed after a first conviction of such person under this paragraph, punishment shall be a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or by both.

10.2 SIGNATORIES AND CERTIFICATION

a. All reports required by this permit shall be signed as follows

(1) for a corporation, by a responsible corporate officer. For the purposes of this section, a responsible corporate officer means:

(i) a president, secretary, treasurer, or a vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making function for the corporation, or

(ii) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars),if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures

(2) for a partnership or sole proprietorship by a general partner or the proprietor, respectively; or

(3) for a municipality, state, federal, or other public agency by either a principal or executive officer or ranking elected official For purposes of this section, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency; or

(4) a duly authorized representative of the person described in items (1), (2), or (3) A person is a duly authorized representative only if

(i) the authorization is made in writing by a person described in paragraph (a)(1), (2), or (3) of this section

(ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or well field, superintendent position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company (A duly authorized representative may thus be either a named individual or any individual occupying a named position) and

(iii) the written authorization is submitted to the Department

b Changes to authorization If an authorization under subparagraph (a)(4) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of subparagraph (a)(4) of this section must be submitted to the Department prior to or together with any reports information, or applications to be signed by an authorized representative

c Certification Any person signing a report shall make the following certification.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted Based on my inquiry of the permit or persons who manage the

system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

d. The Clean Water Act provides that any person who knowingly makes any material false statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or by both. If a conviction of such person is for a violation committed after a first conviction of such person under this paragraph, punishment shall be a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years or by both.

10.3 RECORDING OF MONITORING ACTIVITIES AND RESULTS

a The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement report or application. This period may be extended by request of the Department at any time.

b Records of monitoring information shall include:

(1) the date, exact place, and time of sampling or measurements;

(2) the individual(s) who performed the sampling or measurements;

(3) the date(s) analyses were performed;

(4) the individual(s) who performed the analyses;

(5) the analytical techniques or methods used; and

(6) the results of such analyses.

10.4 TEST AND ANALYTICAL PROCEDURES

a Monitoring and analysis must be conducted using test procedures promulgated pursuant to 40 CFR Part 136, except:

(1) should the Department require the use of a particular test procedure, such test procedure will be specified in Part I of this permit;

(2) should the permittee desire to use a test method not approved herein, prior Department approval is required pursuant to paragraph (b) of this section.

b Application for approval of test procedures shall be made to the Department's Regional Permit Administrator (see Part I, page 1 for address), and shall contain:

(1) the name and address of the applicant or the responsible person making the discharge, the DEC permit number and applicable SPDES identification number of the existing or pending permit, name of the permit issuing agency, name and telephone number of applicant's contact person;

(2) the names of the pollutants or parameters for which an alternate testing procedure is being requested, and the monitoring location(s) at which each testing procedure will be utilized;

(3) justification for using test procedures other than those approved in paragraph (a) of this section; and

(4) a detailed description of the alternate procedure, together with:

(i) references to published studies, if any, of the applicability of the alternate test procedure to the effluent in question;

(ii) information on known interferences, if any; and

(5) a comparability study, using both approved and the proposed methods. The study shall consist of 8 replicates of 3 samples from a well mixed waste stream for each outfall if less than 5 outfalls are involved, or from 5 outfalls if 5 or more outfalls are involved. Four (4) replicates from each of the samples must be analyzed using a method approved in paragraph (a) of this section, and four of the replicates of each sample must be analyzed using the proposed method. This results in 24 analyses per outfall up to a maximum of 120 analyses per permit. A statistical analysis of the data must be submitted that shall include, as a minimum:

(i) calculated statistical mean and standard deviation;

(ii) a test for outliers at the mean ± 3 standard deviations level. Where an outlier is detected an additional sample must be collected and 8 replicates of the sample must be analyzed as specified above;

(iii) a plot distribution with frequency counts and histogram;

(iv) a test for equality among within sample standard deviation;

(v) a check for equality of pooled within sample variance with an F-Test;

(vi) a t-Test to determine equality of method means; and

copies of all data generated in the study.

Additional information can be obtained by contacting the Bureau of Technical Services & Research, NYSDEC, 50 Wolf Road, Albany, New York 12233 - 3502.

[illegible] DISPOSAL SYSTEM OPERATION AND QUALITY CONTROL

[illegible] GENERAL

a. The disposal system shall not receive or be committed to receive wastes beyond its design capacity as to volume and character of wastes treated, nor shall the system be materially altered as to type, degree, or capacity of treatment provided, disposal of treated effluent, or treatment and disposal of separated scum, liquids, solids or combination thereof resulting from the treatment process without written approval of the Department of Environmental [illegible] or its designated field office.

The permittee shall at all times properly [illegible] facilities and systems of treatment and control (or related appurtenances) which are [illegible] by the permittee to achieve compliance with the conditions of this permit. [illegible] also includes as a minimum the following: (1) A preventive/corrective maintenance [illegible] (2) A site specific action oriented operation and maintenance manual [illegible] adequate laboratory controls and appropriate quality assurance procedures. [illegible] the operation of backup or auxiliary facilities or similar systems which are [illegible] only when the operation is necessary to achieve compliance with the conditions of [illegible].

When required under Title 6 of the [illegible] Rules and Regulations of the State of New York (6 NYCRR 650) [illegible] sewage treatment works as required therein and [illegible] personnel shall be employed to satisfactorily operate and maintain the treatment works.

The permittee [illegible]

[illegible] BYPASS

a. Definitions

(1) "Bypass" means the intentional [illegible] waste stream or around any portion of a treatment facility [illegible] the degree of treatment intended for the bypassed portion of [illegible].

(2) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which would not reasonably be expected to occur in the absence of a bypass. Severe property damange does not mean economic loss caused by delays in production.

b. Bypass not exceeding limitations:

The permittee may allow any bypass to occur which does not cause effluent limitations to be violated, but only if it also is for essential maintenance, repair or replacement to assure efficient and proper operation. These bypasses are not subject to the provisions of pargraph (c) and (d) of this section, provided that written notice is submitted prior to bypass (if anticipated) or as soon as possible after bypass (if unanticipated), and no public health hazard is created by the bypass

c. Notice:

(1) Anticipated bypass - If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least forty five (45) days before the date of the bypass

(2) Unanticipated bypass - The permittee shall submit notice of an unanticipated bypass as required in Section 5, paragraph b of this Part (24 hour notice)

d. Prohibition of bypass

(1) Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:

(i) bypass was unavoidable to prevent loss of life, personal injury, public health hazard, or severe property damage;

(ii) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal period of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance or if designed and installed backup equipment which could have prevented or mitigated the impact of the bypass is not operating during the bypass, and

(iii) the permittee submitted notices as required under paragraph (c) of this section and, excepting emergency conditions, the proposed bypass was accepted by the Department

3. UPSET

a. Definition

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

b. Effect of an upset

An upset constitutes an affirmative defense to an action brought for noncompliance with such permit effluent limitations if the requirements of paragraph (c) of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

c. Conditions necessary for a demonstration of upset

A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operation logs, or other relevant evidence that:

(1) an upset occurred and that the permittee can identify the cause(s) of the upset,

(2) the permitted facility was at the time being properly operated; and

(3) the permittee submitted notice of the upset as required in Section 5, paragraph b of this part (24 hour notice)

(4) the permittee complied with any remedial measures required under Section 5, paragraph d of this part.

d. Burden of proof:

In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

11.4 SPECIAL CONDITION - DISPOSAL SYSTEMS WITH SEPTIC TANKS

If a septic tank is installed as part of the disposal system, it shall be inspected by the permittee or his agent for scum and sludge accumulation at intervals not to exceed one year's duration, and such accumulation will be removed before the depth of either exceeds one-fourth (1/4) of the liquid depth so that no settleable solids or scum will leave in the septic tank effluent. Such accumulation shall be disposed of in an approved manner.

11.5 SLUDGE DISPOSAL

The storage or disposal of collected screenings, sludges, other solids, or precipitates separated from the permitted discharges and/or intake or supply water by the permittee shall be done in such a manner as to prevent creation of nuisance conditions or entry of such materials into classified waters or their tributaries, and in a manner approved by the Department. Any live fish, shellfish, or other animals collected or trapped as a result of intake water screening or treatment should be returned to their water body habitat. The permittee shall maintain records of disposal on all effluent screenings, sludges and other solids associated with the discharge(s) herein described. The following data shall be compiled and reported to the Department or its designated field office upon request:

a. the sources of the materials to be disposed of,

b. the approximate volumes, weights, water content and, if other than sewage sludge, chemical composition,

c. the method by which they were removed and transported, including the name and permit number of the waste transporter, and

d. their final disposal locations.

12. CONDITIONS APPLICABLE TO A PUBLICLY OWNED TREATMENT WORKS (POTW)

12.1 GENERAL

a. All POTWs must provide adequate notice to the Department of the following:

(1) any new introduction of pollutants into the POTW from a source which would be subject to section 301 or 306 of the Clean Water Act if it were direct, discharging those pollutants; and

(2) any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

(3) For purposes of this paragraph, adequate notice shall include information on:

(a) the quality and quantity of effluent introduced into the POTW, and

(b) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

b. Dry weather overflows are prohibited. The occurrence of any dry weather overflow constitutes a bypass exceeding limitations as defined in Section 11.2 of this Part and shall be promptly abated and reported to the Department in accord with Section 5 of this Part. The permittee shall inspect all overflow facilities at least twice per year (once each spring and fall) during periods of dry weather flow to ensure they are functioning properly. Records of all inspections shall be maintained for inspection by the Department or its designated representative.

c. The permittee shall identify all inflow to the tributary system and remove excessive infiltration/inflow to an extent which is economically feasible.

d The permittee shall enact, maintain and enforce an up-to-date and effective Sewer Use Ordinance which has been approved by the Department.

e New connections to a publicly owned sewer system or a privatized municipal sewer system are prohibited when the permittee is notified by the Department:

(1) that the discharge(s) regulated by this permit create(s) or is likely to create a public health or potential public health hazard, a contravention of water quality standards or the impairment of the best use of waters, as determined by the Commissioner; or

(2) that the discharge(s) regulated by this permit exceeded the permit limit for a specific parameter including flow, in four of any six consecutive month periods or exceeded a permit limit by 1.4 (1.2 for toxics) times the permit limit in two of any six consecutive month periods, or

(3) that the permittee has failed or is likely to fail to carry out, meet or comply with any requirement of this permit, compliance schedule, order of the Department, judicial order, or consent decree.

f The provisions provided for in e. above shall remain in effect until the Permittee can demonstrate to the Department's satisfaction and approval that adequate available capacity exists in the plant and that the facility is in full compliance with all of effluent limitations required by this permit.

12.2 NATIONAL PRETREATMENT STANDARDS: PROHIBITED DISCHARGES

a General prohibitions

Pollutants introduced into POTW's by a non-domestic source shall not pass through the POTW or interfere with the operation or performance of the works or disposal of sludge. These general prohibitions and the specific prohibitions in paragraph (b) of this section apply to all non-domestic sources introducing pollutants into a POTW whether or not the source is subject to other National Pretreatment Standards or any national, State or local Pretreatment requirements.

b Specific prohibition

In addition to the following pollutants shall not be introduced into a POTW:

(1) pollutants which create a fire or explosion hazard in the POTW;

(2) pollutants which will cause corrosive structural damage to the POTW but in no case discharges with a pH lower than 5.0 unless the works is specifically designed to accommodate such discharges;

(3) solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in interference;

(4) any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW;

(5) heat in amounts which will inhibit biological activity in the POTW resulting in interference but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40° C (104° F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits.

c When Specific Limits Must be Developed by a POTW

(1) POTW's developing POTW Pretreatment Programs pursuant to 40 CFR 403.8 shall develop and enforce specific limits to implement the prohibitions listed in §403.5(a)(1) and (b).

(2) All other POTW's shall, in cases where pollutants contributed by Users, result in interference or Pass-Through and such violation is likely to recur, develop and enforce specific effluent limits for Industrial User(s), and all other users, as appropriate, which, together with appropriate changes in the POTW Treatment Plant's Facilities or operation are necessary to ensure renewed and continued compliance with the POTW's SPDES permit or sludge use or disposal practices.

(3) Specific effluent limits shall not be developed and enforced without individual notice to persons or groups who have requested such notice and an opportunity to respond.

d. Local Limits:

Where specific prohibitions or limits on pollutants or pollutant parameters are developed by a POTW in accordance with paragraph (c) above, such limits shall be deemed Pretreatment Standards for the purposes of §307(d) of the Act.

e. EPA and State Enforcement Actions:

If, within 30 days after notice of an Interference or Pass Through violation has been sent by EPA or DEC to the POTW, and to persons or groups who have requested such notice, the POTW fails to commence appropriate enforcement action to correct the violation, EPA and DEC may take appropriate enforcement action.

APPENDIX H-5.2

Memorandum Regarding SPDES Inspection

THE PORT AUTHORITY OF NY & NJ

Memorandum

TO: *Dennis Malopolski*
FROM: Bernice Malione
DATE: September 19, 2000
SUBJECT: **SPDES INSPECTION – PERMIT NO. NY0006033**
COPY TO: A. Burton, E. Monteverde, P. Taylor, L. Zucchi, Y. de los Angeles, M. Kirshner

We have received the official report on the SPDES inspections performed on March 23, 1999 and March 13, 2000 for the World Trade Center. The state inspection resulted in an evaluation of no reported permit limit exceedances for the periods of April 1998 through April 1999 and April 1999 through March 2000. A copy of the reports are enclosed for your records.

Congratulations are in order for you and your staff! The evaluation reflects the effort expended in maintaining the permit requirements and for protecting the waters of New York.

Bernice R. Malione
Supervisor
Permits & Governmental Approvals
Environmental Engineering Unit

- SECTION THREE -

WORLD TRADE CENTER ENVIRONMENTAL PROGRAMS
1999 YEAR END REPORT

The attached 1999 Year End Report summarizes the environmental activities within the World Trade Department's Supervising Engineer's Office. The report's Table Of Content is as follows:

Section One: Program Highlights

I. Asbestos Program

1) Asbestos Abatement Projects
2) World Trade Center Asbestos Disclosure
3) Elevator Shaft Assessment
4) Preparation of the New World Trade Center Call-in Contract

II. Safety Program

1) ABM Engineering Site Safety Program

III. Environmental Program

1) Hazardous Waste Management
2) Community-right-To-Know Inspections
3) Food Establishment Inspection Program
4) Indoor Air Quality Program

IV. Management Plans Initiated in 1999

1) World Trade Center Hazardous Waste Management Plan
2) World Trade Center Compressed Gas Safety Plan

V. Objectives For 2000

VI. Program Evaluation

VII. Workplace Conduct

Section Two: Attachments

The Port Authority of NY & NJ | Memorandum

TO: John Castaldo, Lee Zucchi
FROM: Art Burton, Pete Negron, Phil Taylor
DATE: January 5, 2000

SUBJECT: ENVIRONMENTAL PROGRAMS YEAR END REPORT.

Attached please find the subject report.

Prepared By:

Art Burton,
Assistant Environmental
Programs Coordinator

Pete Negron,
Asbestos Programs Coordinator

Phil Taylor,
Environmental Programs Coordinator

ASBESTOS AND ENVIRONMENTAL PROGRAMS 1999 YEAR END REPORT

TABLE OF CONTENTS

Section One: Program Highlights.

I) Asbestos Program

1) Asbestos Abatement Projects
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VII) Workplace Conduct

Section Two: Attachments.

- 1999 Asbestos Projects
- World Trade Center Asbestos Disclosure Report
- Elevator Shaft Assessment Report
- World Trade Center Asbestos Abatement Contract Administration
- US EPA Community Right-To-Know Memorandum
- World Trade Center Food Inspection Program
- Hazardous Waste Plan Table of Contents
- World Trade Center Safety Committee

I) ASBESTOS PROGRAM

1) Asbestos Abatement Projects:

In 1999, a total of 130 asbestos abatement projects were performed under World Trade Department contract WTC - 115.295. The cost associated with this work was $2.2 million. In addition, a total of 1,600 cubic yards of asbestos waste was generated.

In summary, 48 vinyl asbestos floor tile projects, 40 fireproofing removals via tent enclosure removal, 17 elevator release responses, 18 surface clean-ups, and 7 Capital projects were performed. The table in Section Two: Attachments – **1999 Asbestos Projects**, describes each project.

2) World Trade Center Asbestos Disclosure:

In accordance with the US Department of Labor's Occupational Safety and Health Administration asbestos regulation 29 CFR 1926.1101: Asbestos in Construction, sections (b): Definitions, and (d)(1-5): Multi-employer worksites, as the building owner the World Trade Department is required to disclose the presence of known or presumed asbestos-containing building materials. The memorandum in Section Two: Attachments – **World Trade Center Asbestos Disclosure Report,** was prepared to notify all concerned parities as to the known locations of asbestos-containing building materials.

3) Elevator Shaft Assessment:

With the assistance of World Trade Vertical Transportation, a condition survey was performed in 22 high rise elevator shafts to explore the control options (full scale removal, localized removal, operations & maintenance response, management-in-place) available to the World Trade Department.

The report in Section Two: Attachments – **Elevator Shaft Inspections**, details the findings. In summary, it was recommended that the asbestos in elevator shafts 22/23A, 10/11B, and 5/48B be completely removed due to signs of delamination. The asbestos in the remaining elevator shafts was found to be intact, and can be controlled by management-in-place practices, and operations & maintenance responses.

4) **Preparation of the New WTC Call-In Contract:**

The World Trade Department's Call-in asbestos abatement contract expired on December 3, 1999. Following discussions with the Engineering Department, it was decided that the Environmental Construction Division of the Engineering Department would administer the next contract for the World Trade Department. Working closely with the Engineering Department's Project, Construction, and Design Divisions, a new contract was developed expanding upon the scope of the previous Call-in contract.

Supplementing the Port Authority's technical specification for "Asbestos Abatement and Disposal, this contract includes all of the applicable variances for the World Trade Center; Vinyl Asbestos Floor Tile Removal Utilizing Dry Ice, Tent Enclosure For The Removal of Fireproofing and Thermal System Insulation, and Application of Spray Encasement To Fireproofing.

World Trade Contract 115.300 was awarded to the asbestos abatement firm of Comprehensive Environmental of New York (CENY). Pete Negron shall continue to coordinate abatement project requests for the World Trade Department. The memorandum in Section Two: Attachments – **World Trade Center Asbestos Abatement Projects**, outlines this change in contract administration, and the procedures to be implemented when requesting abatement work was prepared was distributed to World Trade Department and Real Estate management staff.

II) ENVIRONMENTAL PROGRAMS

1) Hazardous Waste Management:

In 1999, a total of 51.05 tons of hazardous and non-hazardous waste was generated at the World Trade Center; specifically, 44.87 tons of hazardous waste, and 6.18 tons of non-hazardous. The total cost associated with the disposal of the hazardous and non-hazardous waste consignments was $49,773; $41,452.00 for the hazardous waste, and $8,321.00 for the non-hazardous waste.

By comparison, in 1998, a total of 45.57 tons of hazardous was generated. The decrease in the amount of hazardous waste generated is attributed to more frequent subgrade and MER inspections, and ensuing that contractors working in the World Trade Center remove their unused chemicals instead of abandoning them on the truckdock.

The following tables; **1999 World Trade Center Hazardous Waste Streams, and Methods of Disposal,** summarizes the types and quantity of wastes generated, and how the wastes were disposed of.

1999 WORLD TRADE CENTER WASTE STREAMS

Waste Source	Type of Waste	Waste Class	Quantity	Cost
Re-lamping	Mercury-containing fluorescent lamps	Class 9 – Miscellaneous	10.86 Tons	$12,641.00
Electric system upgrades	Lead-sulfuric acid Batteries	Class 8 – Corrosive	24.27 Tons	$19,170.00
Maintenance operations / chemical spill responses	Flammable liquids	Class 3 – Flammable	0.57 Tons	$ 652.00
Maintenance operations	Waste oil	Class 9 – Miscellaneous	0.94 Tons	$ 1,075.00
Renovation operations	PCB capacitors	Class 9 – Miscellaneous	8.23 Tons	$ 7,914.00
Photographic development	Photographic solutions	Class 9 – Miscellaneous	1.84 Tons	}
Food preparation	Cooking oil	Class 9 – Miscellaneous	1.83 Tons	} $ 8.321.00
Maintenance operations	Anti-freeze solution	Class 9 – Miscellaneous	2.51 Tons	}
		Total	**51.05 Tons**	**$49,773.00**

A Trivia Question:

How many linear feet of fluorescent lamps were disposed of in 1999 ?

Answer: **138,585 linear feet or 26.25 miles of lamps.**

METHOD OF DISPOSAL

Type of Waste	Waste Class	Method of Disposal
Mercury-containing fluorescent lamps	Class 9 – Miscellaneous	Recycled
Lead-sulfuric acid batteries	Class 8 – Corrosive	Component Reclamation
Flammable liquids	Class 3- Flammable	Recycled
Waste oil	Class 9 – Miscellaneous	Incinerated
PCB capacitors	Class 9 – Miscellaneous	Incinerated
Photographic solutions	Class 9 – Miscellaneous	Chemically Treated
Cooking oil	Class 9 – Miscellaneous	Recycled
Anti-freeze	Class 9 – Miscellaneous	Recycled

The methods of disposal listed above are consistent with Port Authority policy and US EPA regulations.

2) The World Trade Center's Community-Right-To-Know Inspection:

Chemicals necessary for routine facility operations and maintenance are stored and used at the World Trade Center. Recognizing the hazards facing a community by facilities storing chemicals on site, the US EPA in 1986 enacted the Emergency Planning and Community Right-To-Know Act (CRTK). The CRTK Act requires that all facilities report on, and disclose to the community, 1) the presence of hazardous chemicals stored and used at their facility, and 2) on the releases, both accidental and routine, of such chemicals. Copies of the disclosure are forwarded to the Local Emergency Planning Committee (the NYC Fire Department and the NYC Department of Environmental Protection), and the State Emergency Response Commission (the NYS Department of Environmental Protection).

Since 1986, the Port Authority has complied with the reporting requirements of this regulation. In 1998, the World Trade Center's CRTK report consisted of 170 pages. In the event of an incident involving a location where these chemicals are stored, or an incident which may impact the stored chemicals, the emergency responders will not have time to review a 170 page document.

Therefore, to enhance the effectiveness of this report so that in the event of an incident the emergency responders will know if, and what type(s) of chemicals are involved, this office modified the format of the report as follows:

- Individual binders for 1, 2, 4, and 5 World Trade Center were prepared. An individual binder for the Pump Station was prepared.
- Each chemical storage location within each building was identified and tabbed.
- A material safety data sheet for each chemical was attached to each formal disclosure report.
- Binders were distributed to each Fire Command Desk, World Trade Operations, and Life Safety and Security, and the Port Authority Police Desk.

The memorandum in Section Two: Attachments – **U.S. Environmental Protection Agency Community Right-To-Know Inspections**, details our internal revisions and outlines future modifications to the report.

3) **World Trade Center Food Establishment Inspections:**

The food establishments at the World Trade Center are inspected on a quarterly basis by staff from the Inspection & Safety Division. In accordance with Port Authority procedures and applicable NYC Department of Health regulation, the inspection parameters focus on: food storage, handling, and preparation practices; overall sanitation; establishment maintenance; and pest control. This office participates in the initial and follow-up inspections to ensure that the restaurant operators correct the deficiencies cited on a timely basis. The document in Section Two: Attachments – **World Trade Center Food Establishment Program**, outlines our role.

4) **Indoor Environmental Quality Program:**

When the term "indoor air quality (IAQ) complaint" is used, by meaning alone one is drawn to the conclusion that there is something wrong with the air. However, the quality of the air often times is not the cause of the complaint. Though a contaminated air source or a poorly designed and maintained heating, ventilation, and air conditioning system will lead to IAQ complaints, many other contributory factors need to be examined.

Some of the contributory factors which must be considered during the performance of an IAQ investigation include;

- Newly painted surfaces,
- Construction, demolition, and renovation activities,
- Newly installed or recently cleaned carpets and wall treatments,
- New office furnishings,

- Plants,
- Cooking areas,
- High production photocopying and photographic developing operations,
- Material storage / storage units restricting air flow,
- Sealed or restricted air supply and return grills, and induction units,
- Office space re-configurations.

As can be seen, there can be many localized" factors to IAQ than just "bad" air. Therefore, this office now classifies IAQ complaints as "Indoor Environmental Quality (IEQ)" complaints. By using the term IEQ, our investigations look into the multiple causes of office complaints. We proceed with our investigations with no preconceived assumptions or classifying labels.

Performing a detailed investigation is the key in successfully identifying the cause(s), and/or contributing factors in an IEQ complaint. At the World Trade Center, addressing an IEQ complaint is a multi tier response:

Tier One: Working with the assigned Tower Maintenance Manager and Property Manager, the complainant is interviewed, and the office inspected.

Tier Two: As the investigation continues, the Tower Maintenance Manger and the ABM Engineering Services mechanic offer their expertise in the evaluation the building's ventilation system.

Tier Three: Based upon the nature of the compliant, environmental, occupational health, and industrial hygiene specialists from the Inspection & Safety Division (I&SD) are called in to collect environmental and personnel exposure air monitoring. A report is prepared describing the results of the testing, and recommendations for corrective action.

The standardization of how an inspection is performed is crucial if collected data is to be meaningful. To accomplish this, we utilize the U.S. Environmental Protection Agency's, the U.S. Department of Health and Human Service's, the Public Health Service's, Centers for Disease Control's, and National Institute for Occupational Safety and Health's joint publication "Building Air Quality: A Guide For Building Owners and Facility Managers".

This manual provides information as to:

- Developing a building profile to assist in preventing indoor air quality problems,
- Pollutant pathways,
- Developing an indoor air quality management plan (in our case, it will be an IEQ Plan),
- Identifying causes, solutions, and control strategies to indoor air quality complaints, and,
- The types of inspection and inventory forms which could be used during an inspection.

II) SAFETY PROGRAM

1) ABM Engineering Services Safety Plan Review.

As specified in World Trade Center Contract 799.710: Agreement To Perform Consolidated Electrical, Mechanical & General Maintenance Services, ABM Engineering Services (ABM) is required to submit a copy of their site Safety Program to the World Trade Department for review and acceptance.

In compliance, ABM has submitted for review and comment the following Plans consistent with the development of a Safety Program:

- Permit-Required Confined Space Entry,
- Asbestos Management,
- Hazard Communication,
- Walking / Working Surfaces,
- Materials Handling,
- Personnel Protective Equipment.
- Elimination of Hazardous Energy; Lockout / Tagout

In January, a meeting has been scheduled with ABM, their safety consultant, and this office to:

- Transmit final Safety Plans,
- Discuss what additional Plans are required,
- Discuss ABM employee training schedule,
- Discuss implementation of the U.S. OSHA "Program Evaluation Profile",
- Discuss the implementation of an ABM Safety Committee.

III) MANAGEMENT PLANS INITIATED IN 1999

1) The World Trade Center Hazardous Waste Management Plan:

As defined in US EPA regulation 40 CFR Part 262: Standards Applicable to Generators of Hazardous Waste, Section 262.34 – Accumulation Time, the World Trade Center is considered a "large quantity generator" (LQG). A LQG is defined as a facility, which generates more than 2,200 pounds of hazardous waste within a thirty-day period. As described in **Section One: Environmental Programs** - Hazardous Waste Management, the World Trade Center generated 51 tons of hazardous waste in 1999; or 4.25 tons of hazardous waste per month.

As a LQG, the World Trade Center is required by US EPA regulation to have a program in place to manage hazardous waste storage. US EPA programs parameters include:

- Documented inspections of stored wastes,
- Appropriate waste container marking and labeling,
- Appropriately selected waste containers,
- Designated hazardous waste storage location(s),
- Documentation of waste classification for toxicity, corrisivity, reactivity, and flammability.
- Preparation of a spill contingency / emergency response plan,
- Identification of competent person(s).
- Maintain hazardous waste manifests.

To meet these requirements, this office is preparing the "World Trade Center's Hazardous Waste Management Plan". Though still in the draft stage, the attached draft in Section Two: Attachments – **Hazardous Waste Plan Table of Contents**, describes the format of the Plan. The Plan should be finalized by the end of the second quarter 2000.

2) The World Trade Center Compressed Gas Safety Plan:

A compressed gas cylinder is under extreme pressure. A sudden release of this pressure can result in either vertical or horizontal acceleration, or an explosion. The US Department of Labor's Occupational Safety and Health Administration (US OSHA), the National Fire Protection Association (NFPA), and the Compressed Gas Association (CGA), require that if compressed gas cylinders are to be stored, transported, and used at a facility, a management plan must be in place.

At the World Trade Center, flammable and non-flammable compressed gases are used in welding and torch cutting operations. The gases typically use in these operations include oxygen, nitrogen, and acetylene. Though not considered as toxic gases, they are none the less dangerous. Oxygen is considered an oxidizer, which means it will contribute to fire by the release of oxygen molecules. Nitrogen is an inerting gas, which means it can displace oxygen from the atmosphere. Acetylene is a flammable gas under all environmental conditions.

Using US OSHA, NFPA, and CGA regulations and guidelines, a management plan is being prepared which will detail where compressed gas cylinders are the to stored, how they are to be transported, how they are to be used, and how they are to be disposed of. This Plan should be finalized by the end of the second quarter 2000.

IV) OBJECTIVES FOR 2000

In addition to ensuring that the daily maintenance and operation activities at the World Trade Center are in compliance with applicable environmental and occupational safety regulations, the following initiatives for 2000 have been established:

1) Compete Hazardous Waste Management Plan

- To be completed by the end of the second quarter.

2) Complete Compressed Gas Plan

- To be completed by the end of the second quarter.

3) Standardize IEQ Form and Complaint Procedures

- To be completed by the end of the second quarter.

4) Chemical Substitution

- Examine the use of alternate, less hazardous chemicals to further minimize our hazardous waste stream.

5) Initiate World Trade Department Safety Committee Meetings

- First meeting should be scheduled during the first quarter. The proposed objectives for the Safety Committee are outlined in an Email in Section Two: Attachments – **The World Trade Department Safety Committee.**

6) Participation on the ABM Engineering Services Safety Committee

- Representatives from this office shall be a member on ABM's Safety Committee.

7) Preparation of a Comprehensive Hazardous Materials Management Plan

- To pull together the World Trade Department's hazardous waste management, hazardous materials incident response, and Community Right-To-Know plans, a comprehensive management plan shall be developed detailing how hazardous chemicals are ordered, inventoried, stored, used. and disposed of at the World Trade Center. A draft Plan is expected by the end of the third quarter.

V) PROGRAM EVALUATION

As with any operation, there is always room for improvement. Having reviewed our operation, improvement is needed in the following areas:

1) **Improved Tracking of Spill Responses:**

Though our response was in accordance with US OSHA regulation 29 CFR 1910.120: Hazardous Waste Operations and Emergency Response, and the World Trade Center's Hazardous Materials Incident Response Management Plan, we were however deficient in properly documenting each incident. A report shall now be prepared for each materials incident response.

2) **Improved Container Labeling:**

In accordance with US EPA regulation 40 CFR Part 262: Standards Applicable to Generators of Hazardous Waste, Section 262.31 and 31 – Labeling and Marking, generators of hazardous waste must clearly label and identify the contents of each container in which a hazardous waste is stored. Though we currently mark and label each waste container, there have been instances when container marking was missing or inaccurate. We shall be more diligent to this requirement.

3) **Improve Container Packaging:**

In accordance with US EPA regulation 40 CFR Part 262: Standards Applicable to Generators of Hazardous Waste, Section 262.30 – Packaging, a generator of hazardous waste must select and properly use an appropriate packaging unit. Though we have not had an incident in which a hazardous waste transporter refused to transport the waste consignment, at times our packaging "could have been better". We shall be more diligent to this requirement.

4) **More Timely Response To "Follow-Up's" From Manager:**

A self explanatory issue. Too often, responses to follow-ups, or information requests in general, are not provided on a timely basis. Customer Service starts with a response.

5) **Better Tracking of Overtime and Expenditures:**

Getting caught up in "doing the job" is no reason not too better track and control overtime, and monitor the purchasing of equipment and supplies. Procedures have been implemented to better contain overtime costs, and to substantiate the purchasing of equipment and supplies.

VI) WORKPLACE CONDUCT

Consistent with Port Authority policy and procedures, every effort shall be made to maintain a workplace free from all forms of harassment and discrimination. Supervisory intervention shall be within the guidelines as set forth by the Port Authority in the "Sexual Harassment Prevention & Workplace Behavior Training Program".

SECTION TWO

- ATTACHMENTS -

PETE NERGON
ENVIRONMENTAL PROGRAMS COORDINATOR

1999 ASBESTOS PROJECTS
THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY
PHILIP TAYLOR - SUPERVISING ENGINEER

ARTHUR BURTON
ASSISTANT ENVIRONMENTAL COORDINATOR

W.O. #	PROJECT	SCOPE	TOTAL HRS	ABATED S.F.	UNIT HR/S.F.	CARPET S.F.	CARPET COST	TOTAL COST
PAYMENT NO. 1								
253	1 WTC B-2	VAT		3,475	$4.80			$ 17,895.60
256	4 WTC 7 th flr	VAT		14,250	$1.90			$ 29,010.60
252	1 WTC 54th flr	VAT		22,500	$1.90	19,000	$ 5,700.00	$ 49,665.60
259	1 & 2 WTC MER STP	CLEAN	1,136		$54.24			$ 62,832.24
260	1 WTC 53rd flr	VAT		3,200	$4.80			$ 16,575.60
196	1 WTC B-1stock	CLEAN	443		$54.24			$ 24,001.20
251	5 WTC 10th EMR	CLEAN	40		$54.24			$ 2,169.60
PAYMENT NO. 2								
261	2 WTC 34th	VAT		4,600	$4.80	500	$ 150.00	$ 23,445.60
264	4 WTC 3rd	VAT		4,350	$4.80			$ 22,095.60
251	1 WTC B-1 K-2 EMR	CLEAN	24		$54.24			$ 4,181.76
253	1 WTC B-2	VAT		2,584	$4.80			$ 12,403.20
262	2 WTC 89th flr	VAT		34,500	$1.90			$ 66,765.60
258	4 WTC B-1	VAT		580	$8.22			$ 4,823.20
259	1 & 2 WTC MER STP	CLEAN	2,420		$54.24			$ 131,260.80
196	1 WTC stock	ACM		1,660	$54.24			$ 90,038.40
267	2 WTC 28th flr	VAT		1,850	$4.80	1,000	$ 300.00	$ 10,543.60
265	1 WTC 83rd flr	VAT		6,286	$3.05	6,286	$ 1,885.80	$ 22,273.70
254	4 WTC 9th flr	VAT		7,200	$3.05			$ 23,175.60
EWO 39	4 WTC 3rd flr stair	CLEAN	28		$54.24			$ 1,518.72
PAYMENT NO. 3								
268	1 WTC 46th flr	VAT		990	$6.22	990	$ 297.00	$ 7,070.40
273	4 WTC 5 th flr	VAT		4,650	$4.80			$ 23,535.60
266	2 WTC 25th flr	VAT		33,500	$1.90			$ 64,865.60
274	1 WTC 51th flr	VAT		3,700	$4.80	850	$ 255.00	$ 18,230.60
196	1 WTC B-1 stock	ACM	2,790		$54.24			$ 151,302.48
EWO 040	2 WTC 6th flr	CLEAN	24		$54.24			$ 1,301.76
EWO 041	2 WTC elev 37 & 38th flr	CLEAN	8		$54.24			$ 433.92
112	1 WTC mezz DR RM	ACM	33		$54.24			$ 18,209.40
234	1 WTC B-1 lev subs	ACM	94		$54.24			$ 14,500.00
271	4 WTC conc	VAT		220	$6.22			$ 1,624.00
263	1 WTC corE closets	CLEAN	108		$54.24			$ 5,857.92

135,640 ϕ

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PETE NERGON
ENVIRONMENTAL PROGRAMS COORDINATOR

1999 ASBESTOS PROJECTS
THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY
PHILIP TAYLOR - SUPERVISING ENGINEER

ARTHUR BURTON
ASSISTANT ENVIRONMENTAL COORDINATOR

PAYMENT NO. 4								
196	1 WTC B-1 stock	ACM	1,310		$54.24			$ 71,054.40
257	1 WTC B-2 shop	CLEAN	883		$54.24			$ 48,149.52
269	1 WTC 101st flr	VAT	1,177		$54.24			$ 65,056.08
270	2 WTC B-4	VAT		7,200	$3.05			$ 23,175.60
276	1 WTC mezz post	CLEAN	48		$54.24			$ 2,603.52
278	2 WTC B-6	SPOT	80		$54.24			$ 4,339.20
279	2 WTC 88th flr	VAT		34,600	$1.90	6,500	$ 1,950.00	$ 68,905.60
280	2 WTC 34th flr	VAT		2,225	$4.80	480	$ 135.00	$ 10,815.00
283	1 WTC 108th flr	VAT		600	$6.22			$ 4,347.60
284	1 WTC B-6	VAT		1,600	$4.80			$ 8,895.60
285	1 WTC mezz DR RM	ACM		310.50	$54.24			$ 16,977.12
287	1 WTC mezz tank	SPOT	48		$54.24			$ 2,603.52
288	1 WTC B-1	CLEAN	16		$54.24			$ 867.84
EWO 042	1 WTC elev 49 & 50	CLEAN	8		$54.24			$ 433.92
EWO 043	2 WTC 5th flr	CLEAN	16		$54.24			$ 867.84
PAYMENT NO. 5								
116.097	1 WTC B-1	VAT		30	$6.22			$ 2,000.60
116.099	1WTC 22nd	VAT		1,400	$4.80	900	$ 270.00	$ 8,025.60
116.096	2 WTC 34th flr	VAT		200	$6.22			$ 1,379.60
116.094	2 WTC 26th flr	VAT		3,200	$1.90	2,500	$ 7,500.00	$ 69,515.60
EWO 050	1 WTC elev 22 & 23	CLEAN	16		$54.24			$ 867.84
EWO 049	1 WTC elev 19	CLEAN	39		$54.24			$ 2,115.36
EWO 048	5 WTC 2nd flr	CLEAN	104		$54.24			$ 5,640.96
116.1	1 WTC 85th flr	VAT		2,800	$4.80			$ 14,655.60
EWO 057	1 WTC elev 16 & 17	CLEAN	136		$54.24			$ 7,378.64
116.091	8 WTC B-1 sub	ACM	807.50		$54.24			$ 62,409.60
293	1 & 2 conc lights	CLEAN			NET			$ 1,721.17
PAYMENT NO.6								
272	4 WTC 7th flr	VAT		13,690	$1.90			$ 27,226.60
116.09	2 WTC 53rd flr	VAT		15	$6.22			$ 2,289.90
293	1 & 2 WTC	CLEAN			$54.24			$ 3,254.40
EWO 045	1 WTC elev 16 & 17	CLEAN	109		$54.24			$ 5,912.16
EWO 046	2 WTC elev 33-35	CLEAN	44		$54.24			$ 2,388.56
EWO 047	1 WTC 18-19	CLEAN	24		$54.24			$ 1,301.76

 64,745 ✓

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PAYMENT NO. 7								
EWO 051	1 WTC elev 16 & 17	CLEAN	136		$54.24			$ 7,376.64
116.094	2 WTC 26th flr	VAT		32,000	$1.90	25,000	$ 7,500.00	$ 69,515.60
116.096	2 WTC 34th flr	VAT		200	$6.22			$ 1,379.60
116.097	1 WTC B-3	VAT		300	$6.22			$ 2,001.60
116.099	1 WTC 22nd flr	VAT		1,400	$4.80	900	$ 270.00	$ 8,205.60
116.1	1 WTC 85th flr	VAT		2,800	$4.80			$ 14,655.60
EWO 048	5 WTC 2nd flr	CLEAN	104		$54.24			$ 5,640.96
EWO 049	1 WTC elev 19th flr	CLEAN	39		$54.24			$ 2,115.36
116.091	6 WTC B-1 sub	ACM	803		$54.24			$ 62,409.60
EWO 50	1 WTC elev 22-23	CLEAN	16		$54.24			$ 867.84
293	1 & 2 WTC conc. Lights	CLEAN			NET			$ 1721,17
PAYMENT NO. 8								
116.102	WTC conc.	VAT		384	$6.22			$ 3,004.08
116.092	1 WTC 102nd flr	VAT		23,400	$1.90			$ 45,675.60
116.103	1 WTC B-4	VAT		1,700	$4.80			$ 9,375.60
116.095	1 WTC 104th flr	VAT		550	$6.22			$ 4,036.60
245	1 WTC 42nd MER	ACM	466		$54.25			$ 25,275.84
116.091	6 WTC B-1 sub	ACM	1,677		$54.25			$ 90,960.48
EWO 052	1 WTC elev 16 & 17	CLEAN	67		$54.25			$ 3,634.08
PAYMENT NO. 9								
116.105	2 WTC 75th flr	ACM	473		$54.25			25.655.52
116.11	1 & 2 B-1 dust	DUST	842		$54.25			45.670.08
116.104	2 WTC 22nd	VAT		1,850	$4.80			$ 10,095.00
116.108	2 WTC 27th flr	VAT		12,008	$1.90			$ 24,030.80
116.091	6 WTC B-1 sub	ACM	623.5		$54.25			$ 46,130.23
116.101	1 WTC B-6	CLEAN	456		$54.22			$ 24,733.44
PAYMENT NO.10								
EWO 053	WTC FLOYD	STANDBY	169		$54.24			$ 9,139.44
116.11	1 & 2 WTC B-1 test	CLEAN	224		$54.24			$ 12,149.76
116.115	1 WTC 79th flr	VAT		3,690	$4.80			$ 18,927.60
116.112	2 WTC 75th flr	VAT		430	$6.22			$ 3,290.20
116.114	1 WTC B-6	CLEAN	74		$54.24			$ 4,013.76
116.113	1 & 2 WTC catwalk	CLEAN	468		$54.24			$ 28,384.32
116.107	2 WTC B-2	VAT		1,500	$4.80			$ 8,415.60

82,080 lb

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116.116	1 WTC 41st MER	ACM	192		$54.24			$ 10,414.08
PAYMENT NO.11								
116.107	2 WTC B-2 LVL corridor	VAT		1,030	$4.80			$ 4,944.00
116.122	1 WTC B-1 LVL MER	CLEAN	48		$54.24			$ 2,603.52
116.119	1 WTC 18th MER	CLEAN	48		$54.24			$ 2,603.52
116.113	1 & 2 WTC catwalk	CLEAN	708		$54.24			$ 38,401.92
PAYMENT NO.12								
275	1 WTC 87th flr	DOL FILING						$ 1,215.60
116.093	5 WTC 2nd flr	DOL FILING						$ 1,215.60
116.11	1 WTC 91st flr	DOL FILING						$ 1,215.60
116.117	4 WTC 5 th flr	VAT		35,000	$1.90			$ 70,427.60
116.12	4 WTC B-1	VAT		1,080	$4.80			$ 6,399.60
116.123	1 WTC 104th flr	SPOT	27		$54.24			$ 1,461.48
116.124	1 & 2 WTC freight	VAT		550	$6.22			$ 4,036.60
116.125	2 WTC 37th flr	DOL FILING						$ 1,215.60
116.126	1 WTC 86th flr	DOL FILING						$ 1,215.60
116.127	5 WTC 5th flr	VAT		13,500	$1.90			$ 26,865.60

52,050
TOTAL 334,515

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WTC ASBESTOS DISCLOSURE

THE PORT AUTHORITY OF NY & NJ **MEMORANDUM**

TO:	Jerrold Dinkles, Louis Menno, Edwin Monteverde, Nancy Seliga.
FROM:	John Castaldo
DATE:	December 21, 1999
SUBJECT:	**ASBESTOS POSITIVE LOCATIONS IN THE WORLD TRADE CENTER: UPDATE.**
REFERENCE:	**J. Castaldo to T. Stam, memo dated 10/7/98, 5/4/98 , 2/12/98, same subject.**
COPY:	J. Amatuccio, L. Ardizzone, E. Auerbach, S. Benjamin, V. Borst, C. Bonacci, I. Chachkes, C. DaCosta, F. DeMartini, W. Devlin, J.DiSorbo, M.Hurley, M. Jakubek, U. Mehta, Meyer, E. McGinnley, R. Muessig, J. Napolitano, P. Negron, R. Pruno, F. Riccardelli, J. Richardson, C. Semah, E. Strauss, P. Taylor, G. Tabeek, L. Zucchi, Operations Control Desk, S-4's.

This memorandum is an update to my May, 1998 memorandum wherein I disclosed the known asbestos locations in the World Trade Center.

The S/E quadrant of the 104th in One World Trade Center floor has been abated, and has been removed from the Quadrant Location heading.

The Port Authority has been trying to comply with Industrial Code Rule #56 relative to worker certifications, contractor licensing, and work procedures if asbestos is going to be disturbed or impacted. You are requested to contact this office for the appropriate response action *(facility operations & maintenance activity, or referral to the Engineering Department for abatement)* if asbestos-containing materials may be impacted by work under your jurisdiction.

In compliance with the World Trade Department's asbestos disclosure requirements under the U.S. Occupational Safety and Health Administration asbestos regulation, I am requesting that this information be distributed to all World Trade Department maintenance and construction contractors, tenant contractors, and Engineering Department construction contractors.

Please contact me at 8518, or Pete Negron at 8364 if you have any questions.

John Castaldo
General Manager,
Building Services Management

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located In One World Trade Center - Exclusive Of Elevator Shafts

Full Floor Locations	Quadrant Location	Random Locations On Floor	Subgrades
Lobby Mezzanine 1st - 6th Floors: Core 6th Floor Catwalk 7 / 8 Floor MER 41 / 42 Floor MER 75 / 76 Floor MER 108 / 109 Floor MER		43 / 44 Floor Exhaust Duct 72nd Floor 82nd Floor Core Electric Closets On The 1st - 40th Floors Perimeter Electric Closet On The 30th Floors	B1 Level: Core, North/ West/East Quadrant, B2 Level: Old Locksmith And B6 Level

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located In Two World Trade Center - Exclusive Of Elevator Shafts

Full Floor Locations	Random Locations On Floor	Quadrant Location
6th Floor Catwalk 10th - 13th Floors 41 / 42 Floor MER	Lobby Mezzanine 7 / 8 Floor MER 9th Floor 19th Floor 20th Floor 26th Floor 33rd Floor 71st Floor 75 / 76 Floor MER	S/W, 43rd Floor

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located In Four And Five World Trade Center

There is no asbestos-containing sprayed-on fireproofing in Four and Five World Trade Center.
Thermal system insulation is present in the form of pipe saddles.

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located On The Concourse

There is no asbestos-containing sprayed-on fireproofing in the plenum of the Concourse.
There is thermal system insulation material present.
ACM

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located On The B1 Level And The Truckdock

Asbestos-containing sprayed-on fireproofing and thermal system insulation material is present.

Miscellaneous Asbestos-Containing Materials At The World Trade Center

Base building flooring throughout the facility is vinyl asbestos floor tile (VAT).

ACBM is located behind the convector units at the following locations:
1 WTC; 77, 79, 88, 101, 103 and 105.
2 WTC; 22, 24, 59, 72, 79, 81, 84, 86 and 87.

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World Trade Center Elevator Shafts With Asbestos-Containing Insulation Material

<u>One World Trade Center</u>

Shafts	1 - 5:	Elevator Pit to EMR
	8 - 9:	Elevator Pit to EMR
	16 - 21:	Elevator Pit to 32nd Floor
	22 - 23:	Elevator Pit to EMR
	48:	Elevator Pit to EMR
	49:	Elevator Pit to 32nd Floor
	50:	Elevator Pit to 31st Floor
	24 - 29:	Elevator Pit to EMR
	30 - 35:	Elevator Pit to EMR
	36 - 41:	Elevator Pit to EMR
	42 - 47:	Elevator Pit to EMR
	51 - 56:	Elevator Pit to EMR
	57 - 62:	Elevator Pit to EMR
	63 - 68:	Elevator Pit to EMR
	69 - 74:	Elevator Pit to EMR

<u>Two World Trade Center</u>

Shafts	5 & 48:	Elevator Pit to EMR
	10 & 11:	Elevator Pit to EMR
	14 & 15:	Elevator Pit to EMR
	24 - 29:	Elevator Pit to EMR
	30 - 35:	Elevator Pit to EMR
	36 - 41:	Elevator Pit to EMR
	42 - 47:	Elevator Pit to EMR
	51 - 56:	Elevator Pit to EMR
	57 - 62:	Elevator Pit to EMR
	63 - 68:	Elevator Pit to EMR
	69 - 74:	Elevator Pit to EMR

There is no asbestos-containing insulation material in the J and K elevator cars in 1 and 2 WTC.

There is no asbestos-containing insulation material with the elevator shafts in 4 and 5 WTC.

THE PORT AUTHORITY OF NEW YORK & NEW JERSEY

MEMORANDUM

TO: Phil Taylor-Supervising Engineer.

FROM: Pete Negron

DATE: July 21, 1999

SUBJECT: **Elevator Shaft Asbestos Assessment.**

REFERENCE: **Attached E-Mail**

COPY TO: J. Amatuccio, D. Bobbitt, A. Burton, J. Castaldo, F. Riccardelli, L. Zucchi.

During the week of July 21, 1999, I inspected the elevator shafts to assess the condition of the fireproofing on the steel members.

The attached report includes the shaft number, floor and condition of fireproofing: intact or delaminated, and recommended action.

Floors not listed were inspected and found to be acceptable in that the fireproofing was intact.

In summary, of the 22 shafts inspected, shafts, which require full-scale abatement, are shafts 22/23A, 10B and 48B.

If you require further information regarding this report please contact me at 1.212.435.8364.

Pete Negron
Associate Environmental Analyst
Operations & Maintenance Management
World Trade Center

Attachment

WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
25	1A	NO	YES	24 S.F.	SEAL EDGES
26	1A	NO	YES	12 S.F.	SEAL EDGES
27	1A	NO	YES	30 S.F.	SEAL EDGES
28	1A	NO	YES	12 S.F.	SEAL EDGES
29	1A	NO	YES	48 S.F.	SEAL EDGES
SPRAY-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
9	2A	NO	YES	24 S.F.	SEAL EDGES
27	2A	NO	YES	4 S.F.	SEAL EDGES
28	2A	NO	YES	4 S.F.	SEAL EDGES
29	2A	NO	YES	4 S.F.	SEAL EDGES
30	2A	NO	YES	24 S.F.	SEAL EDGES
31	2A	NO	YES	24 S.F.	SEAL EDGES
34	2A	NO	YES	36 S.F.	SEAL EDGES
38	2A	NO	YES	6 S.F.	SEAL EDGES
SPRAY-ON MATERIAL					

2A

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
310	3A	NO	YES	72 S.F.	SEAL EDGES
5	3A	NO	YES	34 S.F.	SEAL EDGES
8	3A	NO	YES	48 S.F.	SEAL EDGES
9	3A	NO	YES	48 S.F.	SEAL EDGES
16	3A	NO	YES	30 S.F.	SEAL EDGES
17	3A	NO	YES	48 S.F.	SEAL EDGES
18	3A	NO	YES	48 S.F.	SEAL EDGES
19	3A	NO	YES	72 S.F.	SEAL EDGES
28	3A	NO	YES	48 S.F.	SEAL EDGES
34	3A	NO	YES	72 S.F.	SEAL EDGES
40	3A	NO	YES	6 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	4A	YES	NO	NONR	NONE
CEMENTITIOUS MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	5A	YES	NO	NONE	NONE
ALL	48A	YES	NO	NONE	NONE
CEMENTITIOS MATERIAL					

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
22	8A	NO	YES	72 S.F.	SEAL EDGES
33	8A	NO	YES	48 S.F.	SEAL EDGES
36	8A	NO	YES	4 S.F.	SEAL EDGES
38	8A	NO	YES	48 S.F.	SEAL EDGES
39	8A	NO	YES	48 S.F.	SEAL EDGES
SPRAY-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
7	9A	NO	YES	2 S.F.	SEAL EDGES
13	9A	NO	YES	2 S.F.	SEAL EDGES
24	9A	NO	YES	3 S.F.	SEAL EDGES
31	9A	NO	YES	4 S.F.	SEAL EDGES
34	9A	NO	YES	6 S.F.	SEAL EDGES
36	9A	NO	YES	6 S.F.	SEAL EDGES
39	9A	NO	YES	48 S.F.	SEAL EDGES
41	9A	NO	YES	48 S.F.	SEAL EDGES
43	9A	NO	YES	48 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
9	16A	NO	YES	24 S.F.	SEAL EDGES
25	16A	NO	YES	18 S.F.	SEAL EDGES
26	16A	NO	YES	28 S.F.	SEAL EDGES
27	16A	NO	YES	48 S.F.	SEAL EDGES
28	16A	NO	YES	24 S.F.	SEAL EDGES
CEMENTITIUOS MATERIAL					

FLOORS	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	17A	YES	NO	NO	NONE

FLOORS	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	18A	X	NO	NONE	NONE

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT 1 WTC	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
8	19A	NO	YES	16 S.F.	SEAL EDGES
10	19A	NO	YES	24 S.F.	SEAL EDGES
11	19A	NO	YES	24 S.F.	SEAL EDGES
19	19A	NO	YES	48 S.F.	SEAL EDGES
25	19A	NO	YES	48 S.F.	SEAL EDGES
26	19A	NO	YES	48 S.F.	SEAL EDGES
28	19A	NO	YES	24 S.F.	SEAL EDGES
30	19A	NO	YES	24 S.F.	SEAL EDGES
32	19A	NO	YES	2 S.F.	SEAL EDGES
CEMENTITIOUS MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
8	20A	NO	YES	12 S.F.	SEAL EDGES
10	20A	NO	YES	3 S.F.	SEAL EDGES
22	20A	NO	YES	3 S.F.	SEAL EDGES
23	20A	NO	YES	3 S.F.	SEAL EDGES
25	20A	NO	YES	36 S.F.	SEAL EDGES
26	20A	NO	YES	34 S.F	SEAL EDGES
27	20A	NO	YES	26 S.F.	SEAL EDGES
28	20A	NO	YES	30 S.F.	SEAL EDGES
29	20A	NO	YES	28 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
310	21A	NO	YES	24 S.F.	SEAL EDGES
2	21A	NO	YES	24 S.F.	SEAL EDGES
3	21A	NO	YES	24 S.F.	SEAL EDGES
9	21A	NO	YES	24 S.F.	SEAL EDGES
23	21A	NO	YES	24 S.F.	SEAL EDGES
29	21A	NO	YES	48 S.F.	SEAL EDGES
32	21A	NO	YES	6 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
3	22A	NO	YES	4 S.F.	SEAL EDGES
4	22A	NO	YES	4 S.F.	SEAL EDGES
5	22A	NO	YES	4 S.F.	SEAL EDGES
6	22A	NO	YES	4 S.F.	SEAL EDGES
7	22A	NO	YES	4 S.F.	SEAL EDGES
8	22A	NO	YES	4 S.F.	SEAL EDGES
9	22A	NO	YES	4 S.F.	SEAL EDGES
10	22A	NO	YES	4 S.F.	SEAL EDGES
11	22A	NO	YES	4 S.F.	SEAL EDGES
12	22A	NO	YES	4 S.F.	SEAL EDGES
13	22A	NO	YES	4 S.F.	SEAL EDGES
14	22A	NO	YES	6 S.F.	SEAL EDGES
15	22A	NO	YES	4 S.F.	SEAL EDGES
16	22A	NO	YES	12 S.F.	SEAL EDGES
18	22A	NO	YES	6 S.F.	SEAL EDGES
19	22A	NO	YES	6 S.F.	SEAL EDGES
20	22A	NO	YES	6 S.F.	SEAL EDGES
21	22A	NO	YES	6 S.F.	SEAL EDGES
22	22A	NO	YES	6 S.F.	SEAL EDGES
23	22A	NO	YES	6 S.F.	SEAL EDGES
24	22A	NO	YES	6 S.F.	SEAL EDGES
25	22A	NO	YES	6 S.F.	SEAL EDGES
26	22A	NO	YES	8 S.F.	SEAL EDGES
27	22A	NO	YES	6 S.F.	SEAL EDGES
28	22A	NO	YES	48 S.F.	SEAL EDGES
29	22A	NO	YES	6 S.F.	SEAL EDGES
30	22A	NO	YES	6 S.F.	SEAL EDGES
31	22A	NO	YES	6 S.F.	SEAL EDGES
32	22A	NO	YES	6 S.F.	SEAL EDGES
33	22A	NO	YES	6 S.F.	SEAL EDGES
34	22A	NO	YES	6 S.F.	SEAL EDGES
35	22A	NO	YES	4 S.F.	SEAL EDGES
36	22A	NO	YES	8 S.F.	SEAL EDGES
37	22A	NO	YES	6 S.F.	SEAL EDGES
38	22A	NO	YES	6 S.F.	SEAL EDGES
39	22A	NO	YES	24 S.F.	SEAL EDGES
40	22A	NO	YES	8 S.F.	SEAL EDGES
41	22A	NO	YES	8 S.F.	SEAL EDGES
42	22A	NO	YES	8 S.F.	SEAL EDGES
43	22A	NO	YES	8 S.F.	SEAL EDGES
44	22A	NO	YES	8 S.F.	SEAL EDGES
45	22A	NO	YES	8 S.F.	SEAL EDGES
46	22A	NO	YES	8 S.F.	SEAL EDGES
47	22A	NO	YES	8 S.F.	SEAL EDGES
48	22A	NO	YES	2 S.F.	SEAL EDGES
49	22A	NO	YES	6 S.F.	SEAL EDGES
50	22A	NO	YES	2 S.F.	SEAL EDGES
51	22A	NO	YES	4 S.F.	SEAL EDGES
52	22A	NO	YES	4 S.F.	SEAL EDGES
54	22A	NO	YES	4 S.F.	SEAL EDGES
55	22A	NO	YES	2 S.F.	SEAL EDGES
56	22A	NO	YES	48 S.F.	SEAL EDGES
58	22A	NO	YES	3 S.F.	SEAL EDGES
62	22A	NO	YES	2 S.F.	SEAL EDGES
64	22A	NO	YES	2 S.F.	SEAL EDGES
67	22A	NO	YES	2 S.F	SEAL EDGES

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
70	22A	NO	YES	3 S.F.	SEAL EDGES
73	22A	NO	YES	2 S.F.	SEAL EDGES
78	22A	NO	YES	2 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL			ABATEMENT OF SHAFT IS RECOMMENDED		

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
16	23A	NO	YES	2 S.F.	SEAL EDGES
17	23A	NO	YES	2 S.F.	SEAL EDGES
18	23A	NO	YES	2 S.F.	SEAL EDGES
19	23A	NO	YES	2 S.F.	SEAL EDGES
20	23A	NO	YES	2 S.F.	SEAL EDGES
21	23A	NO	YES	2 S.F.	SEAL EDGES
22	23A	NO	YES	2 S.F.	SEAL EDGES
23	23A	NO	YES	2 S.F.	SEAL EDGES
24	23A	NO	YES	2 S.F.	SEAL EDGES
25	23A	NO	YES	2 S.F.	SEAL EDGES
26	23A	NO	YES	2 S.F.	SEAL EDGES
27	23A	NO	YES	2 S.F.	SEAL EDGES
28	23A	NO	YES	2 S.F.	SEAL EDGES
29	23A	NO	YES	2 S.F.	SEAL EDGES
30	23A	NO	YES	2 S.F.	SEAL EDGES
31	23A	NO	YES	2 S.F.	SEAL EDGES
32	23A	NO	YES	2 S.F.	SEAL EDGES
33	23A	NO	YES	2 S.F.	SEAL EDGES
34	23A	NO	YES	2 S.F.	SEAL EDGES
35	23A	NO	YES	2 S.F.	SEAL EDGES
36	23A	NO	YES	2 S.F.	SEAL EDGES
37	23A	NO	YES	2 S.F.	SEAL EDGES
73	23A	NO	YES	1 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL			ABATEMENT OF SHAFT IS RECOMMENDED		

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
3	10B	NO	YES	6 S.F.	SEAL EDGES
4	10B	NO	YES	6 S.F.	SEAL EDGES
7	10B	NO	YES	8 S.F.	SEAL EDGES
12	10B	NO	YES	1 S.F.	SEAL EDGES
15	10B	NO	YES	2 S.F.	SEAL EDGES
19	10B	NO	YES	20 S.F	SEAL EDGES
20	10B	NO	YES	15 S.F.	SEAL EDGES
21	10B	NO	YES	26 S.F.	SEAL EDGES
22	10B	NO	YES	28 S.F.	SEAL EDGES
23	10B	NO	YES	15 S.F.	SEAL EDGES
25	10B	NO	YES	48 S.F.	SEAL EDGES
28	10B	NO	YES	4 S.F.	SEAL EDGES
29	10B	NO	YES	2 S.F.	SEAL EDGES
31	10B	NO	YES	2 S.F.	SEAL EDGES
34	10B	NO	YES	48 S.F.	SEAL EDGES
35	10B	NO	YES	48 S.F.	SEAL EDGES
36	10B	NO	YES	34 S.F.	SEAL EDGES
37	10B	NO	YES	24 S.F.	SEAL EDGES
39	10B	NO	YES	48 S.F.	SEAL EDGES
40	10B	NO	YES	48 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL			ABATEMENT OF SHAFT IS RECOMMENDED		

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
5	11B	NO	YES	1 S.F.	SEAL EDGES
12	11B	NO	YES	1 S.F.	SEAL EDGES
19	11B	NO	YES	2 S.F.	SEAL EDGES
26	11B	NO	YES	2 S.F.	SEAL EDGES
31	11B	NO	YES	48 S.F.	SEAL EDGES
33	11B	NO	YES	2 S.F.	SEAL EDGES
40	11B	NO	YES	2 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	5B	YES	NO	NONE	NONE
ALL	48B	NO	YES	***	ABATEMENT
48B SHAFT-SPRAYED-ON FIREPROOFING					
*** 1' - FOOT STRIP ALONG LENGTH OF COLUMN MISSING.					

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
3	14B	NO	YES	2 S.F.	SEAL EDGES
4	14B	NO	YES	2 S.F.	SEAL EDGES
8	14B	NO	YES	1 S.F.	SEAL EDGES
9	14B	NO	YES	1 S.F.	SEAL EDGES
10	14B	NO	YES	1 S.F.	SEAL EDGES
11	14B	NO	YES	1 S.F.	SEAL EDGES
12	14B	NO	YES	1 S.F.	SEAL EDGES
13	14B	NO	YES	1 S.F.	SEAL EDGES
14	14B	NO	YES	1 S.F.	SEAL EDGES
15	14B	NO	YES	1 S.F.	SEAL EDGES
16	14B	NO	YES	1 S.F.	SEAL EDGES
17	14B	NO	YES	1 S.F.	SEAL EDGES
18	14B	NO	YES	1 S.F.	SEAL EDGES
23	14B	NO	YES	1 S.F.	SEAL EDGES
24	14B	NO	YES	1 S.F.	SEAL EDGES
25	14B	NO	YES	1 S.F.	SEAL EDGES
26	14B	NO	YES	1 S.F.	SEAL EDGES
27	14B	NO	YES	1 S.F.	SEAL EDGES
28	14B	NO	YES	1 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
310	15B	NO	YES	4 S.F.	SEAL EDGES
3	15B	NO	YES	2 S.F.	SEAL EDGES
4	15B	NO	YES	4 S.F.	SEAL EDGES
22	15B	NO	YES	1 S.F.	SEAL EDGES
25	15B	NO	YES	8 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

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WTC ASBESTOS CONTRACT ADMINISTRATION

THE PORT AUTHORITY OF NY & NJ **MEMORANDUM**

TO: C. Bonacci, F. DeMartini, G. Meyer, T. Lynch, L. Menno, E. Monteverde, R. Muessig, K. Piatt, N. Seliga, T. Sheehan
FROM: Leandro Zucchi
DATE: December 13, 1999
SUBJECT: **WORLD TRADE CENTER ASBESTOS ABATEMENT PROJECTS.**

COPY TO: L. Ardizzone, J. Castaldo, R. Benacchio, W. Devlin, W. Hamann, D. Karpiloff, T. Kobel, P. Negron, F. Riccardelli, J. Richardson, H. Ret, E. Strauss, P. Taylor, F. Varriano

As you may already know, the World Trade Department's Call-in asbestos abatement contract with Asbestos Containment Services Incorporated (ASCI) expired on December 3, 1999. The new World Trade Center Call-in asbestos abatement contract, WTC 115.300, will be administered by Environmental Construction Division of the Engineering Department. The new contractor is Comprehensive Environmental of New York (CENY).

In order to ensure a smooth transition we have established the following quidelines:

1. Requests for asbestos surveys, bulk sampling, and air sampling should be submitted to Pete Negron. Pete will investigate and respond accordingly.

2. Abatement projects in support of tenant lease requirements and negotiations should be addressed as follows:

   - Requests for abatement work should be submitted in writing to Pete Negron for transmittal to the Engineering Department.
   - To expedite the process, each project request should include:

     - A site drawing indicating the building, floor, work site boundary, and suite number;
     - A scope of work;
     - A demolition and renovation drawing and schedule;
     - Time allocated (start and completion dates) for asbestos abatement;
     - A charge code;
     - Contact person to arrange access;
   - Pete Negron will coordinate the work through the Engineering Department and keep you informed of its progress.

Please note that experience has shown that vinyl asbestos floor tile (VAT) projects up to 10,000 square feet requires five (5) days to perform the abatement; from 10,000 to 30,000 square feet requires ten (10) days; and full floors require fifteen (15) days. In addition to the time required to complete a VAT removal project, fifteen (15) days advanced notice is required to: (1) collect the required bulk samples; (2) notify tenants on, above and below the abatement floor of the project; (3) notify the regulatory agencies, and (4) design the project. Therefore, we recommend that you consider these factors prior to establishing your schedule.

Should you have any questions, please feel free to contact Pete Negron or me at 435-8364 or 435-5798 respectively. Meanwhile, I thank you for your attention to this matter.

Leandro Zucchi

Leandro Zucchi, RPA
Manager
Operations & Maint. Mgmt.

/lb

5C

The Port Authority of New York and New Jersey **Memorandum**

TO: Louis Menno, Nancy Seliga, Ted Stam, Capt. A. Whitaker
FROM: Phil Taylor
DATE: September 3, 1999

SUBJECT: **U.S. Environmental Protection Agency Community-Right-To-Know Inspections.**

COPY: L. Ardizzone, J. Barbella, J. Bonczek, A. Burton, J. Castaldo, T. Degnan, W. Devlin, T. Falabella, K. Grouzalis, W. Hamann, B. Hutchinson, M. Hurley, D. Karpiloff, D. Malopolski, P. Negron, E. Strauss, L. Zucchi

The intent of this memorandum is to outline the reporting requirements of the U.S. Environmental Protection Agency's Community-Right-To-Know regulation, and to describe how the reports were modified for emergency response preparedness at the World Trade Center. The information is provided in three sections; Section One reviews the history of environmental regulation, Section Two outlines the Community-Right-To-Know regulation, and Section Three describes how the reports were modified for use at the World Trade Center.

History of Environmental Regulation

The first "environmental" regulation was the River and Harbors Act of 1899. This regulation was enacted to control the amount of floating debris which could interfere with maritime traffic. The aspect of "chemical" pollution was not a consideration.

Following World War II, the United States experienced many social, economic, and industrial changes. With industrial diversity came a proliferation in the formulation and use of chemicals. This proliferation, coupled with the uncontrolled release of their end-products (pollution) into the environment slowly began to draw the publics attention. The public became more aware about the ecological effects of pollution, as well as the adverse impact of chemicals and pollution on human health. This awareness can best be illustrated in Rachel Carson's book entitled "Silent Spring". This book, published in 1962, described the impact of DDT use on the environment. The environmental movement was underway.

During the 1970s and early 1980s, a series of environmental laws were passed which established programs to address the pollutants released into the environment: the Clean Water Act (CWA), the Clean Air Act (CAA), the Comprehensive Environmental Response, Compensation, and Liabilities Act (CERCLA), and the Resource Conservation and Recovery Act (RCRA). Though there was a heighten concern about protecting the environment, the mind set was that if you didn't see smoke in the air, oil slicks on the water, or half-buried fifty-five gallon drums, no threat existed. This changed in 1984.

On December 4, 1984, a cloud of methyl isocyanate gas, an extremely toxic chemical, escaped from a Union Carbide chemical plant in Bhopal, India. The cause of the release was attributed to a chemical manufacturing process failure. More than 2,500 people lost their lives and tens of thousand more were injured; some with long term permanent disabilities. Unfortunately, the attitude was "something like that can't happen here"; but it did. A similar incident occurred in West Virginia in 1985 when a chemical manufacturing process failure caused the release of aldicarb oxime; another extremely hazardous chemical.

As a result of these catastrophic environmental accidents, the U.S. Environmental Protection Agency (EPA) established the voluntary Chemical Emergency Preparedness Program (CEPP). The intent of the CEPP was to improve the planning and response capabilities at the state and local level. Concurrent with the U.S. EPA's efforts, the Chemical Manufacturers Association (CMA), an industry group, established a voluntary program called Community Awareness and Emergency Response (CAER). The intent of CAER was to encourage a closer relationship between facilities where chemicals are stored and used, and their surrounding community.

To formally address the risks posed by the presence of facility stored chemicals in our communities, the U.S. EPA initiated rule making hearings to establish a framework for emergency planning and responses to chemical releases at the state and local level. The Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), also known as Tittle III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) was enacted. Related to EPCRA, on February 24,1992, the U.S. Occupational Safety and Health Administration issued their final rule on chemical process safety; 29 CFR 1910.119 – Process Safety Management.

The Community-Right-To-Know Regulation

SARA Title III requires that all facilities report on, and disclose to the community, 1) the presence of hazardous chemicals stored and used at their facility, and 2) on the releases, both accidental and routine, of such chemicals. These disclosure documents are used by the state and local emergency response entities, such as police and fire departments, emergency response teams, emergency management offices, and hospitals. Many of the earlier voluntary programs under CEPP and CAER now became mandatory under SARA Title III.

The Emergency Planning and Community Right-to-Know Act contains four major provisions: I) Planning for Chemical Emergencies, II) Emergency Notification of Chemical Accidents and Releases, III) Reporting of Hazardous Chemical Inventories, and IV) Toxic Chemical Release Reporting. Provisions I, II, and III are described below:

I. The Planing for Chemical Emergencies provision is designed to help a community prepare for, and respond to, emergencies involving hazardous substances. Every community in the United States must be part of a Comprehensive State Plan.

II. For the Emergency Notification of Chemical Accidents and Releases, a facility must immediately notify the community Local Emergency Planning Committee (LEPC) and State Emergency Response Commission (SERC) of a chemical release exceeding a predetermined amount. It also requires notification of the release to the National Response Center (NRC), which alerts the federal responders.

III. The Reporting of Hazardous Chemical Inventories is documented in one of two different ways:

1. The first is through the preparation and distribution of Material Safety Data Sheets (MSDS), which contain information on a product's chemical and physical properties and health effects. MSDS must be available to all workers so that they know about the chemical hazards they are exposed to, and the precautions for their safe handling.

2. The second way that companies must report on hazardous chemicals is by submitting annual inventories to the LEPC, the SERC, and the local fire department. The law includes a "Two Tier" approach to inventory reporting.

Under Tier I, a facility must report the amounts, and general location of chemicals within certain hazard categories. For example, a Tier I report might say that a facility stores 10,000 pounds of a substance that cause chronic health effects.

A Tier II report contains basically the same information, but it must name the specific chemical. A Tier II report might say that the facility has 500 pounds of benzene, and it would indicate the physical and health hazards associated with benzene.

Congress (through EPRCA) gave companies the flexibility to choose whether to file a Tier I or Tier II report, unless a state or local government requires Tier II reporting. The U.S. EPA believes however that Tier II reporting provides emergency planners and responders, and communities with more useful information, and is encouraging all facilities to submit Tier II reports. Since EPRCA's enactment, the Port Authority has complied with this regulation by preparing the Tier II report for each location where chemicals are stored at each facility.

Report Modification For Emergency Preparedness Use At The World Trade Center

At the World Trade Center, the environmental consultant firm of Killam Associates has performed the annual Community-Right-To-Know inspections. All Port Authority areas (workshops, storerooms, storage areas, and office spaces) where chemical products are known to be stored were inspected, and the products inventoried. Killam Associates completed the Tier II forms, obtained the required MSDS from the chemical manufactures, and forwarded copies of the report to the NYC Fire Department, the NYC Department of Environmental Protection (LEPC), and the NYS Department of Environmental Conservation (SERC).

The WTC's Community-Right-To-Know report consists of 170 Tier II reports; this is exclusive of the required MSDS attachments. In the event of an incident involving a location where these chemicals are stored, or an incident which may impact the stored chemicals, the emergency responders will not have time to review a 170 page plus document.

Therefore, to enhance the effectiveness of this report so that in the event of an incident the emergency responders will know if, and what type(s) of chemicals are involved, this office has modified the format of the report sent to the regulatory agencies as follows:

I. The Community-Right-To-Know report has been separated into five binders: One, Two, Four, and Five WTC, and the Pump Station

II. Chemical storage locations within each building are identified and tabbed.

III. A MSDS for each chemical product is attached to each Tier II report. Where a MSDS was not available, the National Fire Protection Association ratings were used.

The following is a summary of the locations in the WTC where chemicals are stored:

1 WTC	2 WTC	4 WTC	5 WTC	Pump Station
B6 "J" Area	B4 ACE Elev. MOD S	B1 Mechanical Shop	B1 Supply Room	
B6 MER	B2 Rag Room	B1 Mechanical Storage Room		
B6 "J" Area/Welding	B1 ABM Main Stockroom	3rd floor Formica Shop		
B5 "J" Area	B1 ACE Warehouse	3rd floor Carpentry		
B5 Chiller Plant	4th floor ABM Storage Area	3rd floor Paint Storage		
B4 Sheet Metal Shop	37th floor Sign Shop			
B4 Chemical Room				
B4 Pump Shop				
B4 Electrical Shop				
B4 Motor Shop				
B2 Slurry Wall Shop				
B2 Paint Shop				
B1 Main Stock Room				
B1 Equipment Stock Room				
62nd floor PA Medical				
86th floor PA Graphic				

Having the WTC's Community-Right-To-Know report separated into individual buildings, and then further sub-divided by each storage location creates a document which can be quickly referenced in the event of an emergency.

These binders, ready for release by mid-September, and shall be distributed as follows:

- Each Fire Command Desk in One, Two, Four, and Five WTC shall receive a binder for that building. These binders shall be delivered to Mike Hurley.

- The Life Safety & Security office shall receive binders for 1, 2, 4, and 5 WTC, and the Pump Station. These binders shall be delivered to Mike Hurley.

- The PA Police Desk shall receive binders for 1, 2, 4, and 5 WTC, and the Pump Station. These binders shall be delivered to Capt. A. Whitaker.

- The WT Operations office shall receive two binders each (one for the office and the second for the 77 Desk) for 1, 2, 4, and 5 WTC. These binders shall be delivered to Ed Strauss.

- Ken Grouzalis shall receive the binders for 1, 2, 4, and 5 WTC.

- An additional binder shall be maintained in my office.

In addition to the master binders described above, each workshop, storeroom, storage area, and office space where chemicals were inventoried shall be provided with the Tier II report(s) and MSDS(s) specifically for the products stored at that location. These specific storage area reports shall be delivered to a WTD or PA supervisor so that the report can be forwarded to the appropriate contractor or staff member.

Each report shall have attached a copy of this memorandum. If storage areas have been re-located, please let me know so that we can make the necessary revisions.

To further enhance these modified reports, we plan on making the following revisions in the 2000 Community-Right-To-Know inspection binders:

I. A site drawing highlighting the storage location(s) on the floor shall be included. For emergency responder identification, the National Fire Protection Association hazard recognition system NFPA 704 – "Identification of the Hazards of Materials for Emergency Response" shall be noted on the drawing.

II. Tier II reports identifying "fire hazards" shall be photocopied on red paper.

III. The 2000 Community-Right-To-Know inspection shall be expanded to include tenant spaces, and Port Authority occupied floors.

Should you have any questions or suggestions, please contact me at x 8507. I would also appreciate any recommendations you may have regarding the proposed format for the 2000 report. Thank you.

Phil Taylor

THE PORT AUTHORITY OF NY & NJ MEMORANDUM

TO: Phil Taylor, Supervising Engineer
FROM: Pete Negron
DATE: October11, 1999

SUBJECT: 1999 Food Establishment Inspection Program.

The following is the summary of the Food Establishment Inspection Program at the World Trade Center.

Assisted the Inspection & Safety Division with their Food Establishment Inspection Program at the World Trade Center, the follow-up procedures were as follows:

1) At the conclusion of each inspection, the I&SD public health sanitarian provided to the restaurant operator with a "Corrective Action Form". This form, was completed and returned by the operator, the operator stated on the document what the operator did to correct the noted deficiencies (violations of the NYC Health Code or PA standards). These forms were returned to the I&SD within 5 days to 10 days of the initial inspection.

2) Upon receipt of the Form, the I&SD public health sanitarian decided if a follow-up visit was required. The basis of this determination was based upon the type of violation, extent of the problem, and the thoroughness of the response. If the response was comprehensive, no further action was taken.

If on the other hand, the food establishment did not respond, or the public health sanitarian felt the operator's response was incomplete, that establishment was re-visited.

During the second visit, the operator was again advised of their obligation to complete the Form, and submit it to the I&SD. After an additional 5 days the operator did not submit the Form, the I&SD public health sanitarian returned to the establishment to determine if the noted deficiencies still existed. If they did, the options available to the I&SD public health sanitarian are, but were not limited to:

a) Discarded and denatured all raw or prepared foods which was contaminated,
b) Discarded and denatured all out-dated dairy products,
c) Discarded and denatured all cold and hot foods stored out of temperature,
d) Cease all food preparation on surfaces which are contaminated,
e) Discarded and denatured all food which was prepared on contaminated surfaces,
f) Ceased all food handling and preparation if employee handwashing facility was inadequate,
g) Ceased food preparation is areas where insect or rodent activity or droppings are present,
h) Shut down the establishment.

Prior to any action being taken, the I&SD public health sanitarian notified, and requested assistance from, the facility. Initial inspections at the WTC started on Monday, September 13th and was completed the two weeks thereafter.

To: Lee Zucchi

Cc: R. Benacchio,; J. Castaldo L. Menno. E. Monteverde, M. Ptaskon.
B. Ramos, N, Seliga, P. Taylor, G. Wojnar, F. Varriano.

Subject: REVISED PA FOOD ESTABLISHMENT INSPECTION PROGRAM.

The Inspection & Safety Division has revised their Food Establishment Inspection Program follow-up procedures as follows:

1) At the conclusion of each inspection, the I&SD public health sanitarian shall provide to the restaurant operator a "Corrective Action Form". This form, to be completed by the operator. shall document what the operator is going to do to correct the noted deficiencies (violations of the NYC Health Code or PA standards). These forms must be returned to the I&SD within 5 days of the initial inspection.

2) Upon receipt of the Form, the I&SD public health sanitarian shall decided if a follow-up visit is required. The basis of this determination shall be based upon the type of violation, extent of the problem, and the thoroughness of the response. If the response is comprehensive, no further action shall be taken.

If on the other hand, the food establishment doesn't respond. or the public health sanitarian feels the operator's response is incomplete. that establishment shall be re-visited.

During the second visit. the operator shall again be advised of their obligation to complete the Form, and submit it to the I&SD. If after an additional 5 days the operator still does not submit the Form, the I&SD public health sanitarian shall return to the establishment to determine if the noted deficiencies still exist. If they do. the options available to the I&SD public health sanitarian are, but not limited to:

a) Discard and denature all raw or prepared foods which may be contaminated.
b) Discard and denature all out-dated dairy products.
c) Discard and denature all cold and hot foods stored out of temperature.
d) Cease all food preparation on surfaces which are contaminated,
e) Discard and denature all food which was prepared on contaminated surfaces.
f) Cease all food handling and preparation if employee handwashing facility is inadequate.
g) Cease food preparation is areas where insect or rodent activity or droppings are present.
h) Shut down the establishment.

Prior to any action being taken, the I&SD public health sanitarian shall notify, and request assistance from, the facility. Initial inspections at the WTC start on Monday, September 13th. The WTC and the I&SD has always worked cooperatively in this area and will continue to do so.

Should it become necessary for the I&SD public health sanitarian to take any action, my office shall be notified, and we will in turn notify the appropriate Property Manager.

PT

vlor, Phillip

ım:	Taylor, Phillip
ınt:	Friday, December 03, 1999 7:20 AM
ro:	Negron, Peter; Burton, Arthur
Cc:	Zucchi, Lee
Subject:	WTC / US EPA RCRA PLAN.

Attached please find the beginnings of our RCRA plan. I am also putting a hard copy in your mailboxes.

PT

ıft Outline for the World Trade Center's Hazardous Waste Management Plan

I) Introduction:

- What are the sources of hazwaste at the WTC,
- What types of hazwastes are generated,
- What are our regulatory obligations to manage the hazwaste,

II) Objective of Plan:

- To develop a management plan which ensures the protection of the environment and personnel,
- To develop a management plan which ensures the safe handling and storage of hazwaste,
- To develop a management plan which ensures the proper classification of hazwaste,
- To develop a management plan which ensures the proper hazwaste consignment labeling,
- To develop a management plan which ensures the proper hazwaste manifesting,
- To develop a management plan which ensures emergency responses to releases.

How to achieve Objectives –

- Develop a management plan consistent with the US EPA RCRA regulation,
- Develop a management plan based upon an identification of the waste streams,
- Develop a management plan following best management and industry practices,
- Develop a management plan with detailed emergency response procedures,
- Develop a management plan emphasizing awareness and training.

III) The Resource Conservation and Recovery Act of 1976

Introduce RCRA –

1) What it is,
2) Why it was enacted,
3) When it was enacted,
4) What it regulates,
5) What it defines,
6) What is applicability to the WTC

IV) Regulatory Sections Applicable to the World Trade Center Definitions

- Citations
- Applicable Sections of Compliance

V) Spill Preparedness

- The World Trade Centers Emergency Response Plan To Hazardous Materials Incidents

Taylor, Phillip

om:	Taylor, Phillip
ent:	Tuesday, November 09, 1999 10:43 AM
To:	Ardizzone, Leonard; Devlin, William; Strauss, Edward; Hurley, Michael; Riccardelli, Francis; De Martini, Frank; Koebel, Teresa; Menno, Louis; Seliga, Nancy; Monteverde, Edwin
Cc:	Castaldo, John; Zucchi, Lee; Lutin, Delia; Serio, Augustine
Subject:	WTC SAFETY COMMITTEE.

In accordance with the guidelines established by the PA and the Inspection & Safety Division, and to be consistent with the practices at other PA facilities, I am in the process of establishing the WTC's Safety Committee for the year 2000. On a monthly basis, meetings are held at each PA facility to address the broad range of worker safety issues. At KIA for example, under the Safety Committee there are sub-committees to address and report on issues pertaining to office safety, construction safety, and traffic safety. The committees have representatives from each unit, with levels ranging from facility managers to FMs.

The objective for our WTD Committee shall be to 1) implement the U.S. OSHA "Program Evaluation Profile (PEP)", 2) encourage the safety management relationship of "man, media, machine, and management", and 3) evaluate the types and classes of injuries with the end result being occurrence reduction.

US OSHA PEP -

The U.S. OSHA PEP is a performance-based criteria in which 1) workplace analysis, 2) hazard prevention, 3) management leadership and worker participation, 4) safety and health training, 5) accident analysis, and 6) emergency responses, are evaluated.

"MAN, MEDIA, MACHINE, and MANAGEMENT -

The relationship between "man (person), media, machine, and management" in accident causation and prevention is a concept which states that at deficiency in one area creates a domino effect increasing the likelihood of an accident.

INJURY REDUCTION-

By reviewing the types of injuries, we can focus on what specific measures need to be taken to reduce, and hopefully eliminate, any re-occurrences. The most effective way to accomplish this is by performing a Job Safety Analysis.

To establish our Committee, I am requesting that you provide me with two names: 1) the name of the primary Safety Committee representative, and 2) the name of an alternate. In addition to PA staff, I have the concurrence from the Inspection & Safety Division to have contract staff participate on our committee. I am therefore requesting the names of the primary and alternate for ABM Janitorial, ABM Engineering Services (I shall address this), ACE Elevator, Summit Security, FINE Painting, and Turner Construction.

I would like to have our first Committee meeting in January. Please provide me the Committee members (PA and contract staff) names by the end of November so that I can formally invite them to our kick off meeting.

Please call me at 8507 should you have any questions.

Thanks.

PT

APPENDIX H-7

Asbestos-Containing Materials

Taylor, Phillip

o: Wayne
Subject: ASBESTOS NOTIFICATION.

You asked on Monday if we comply with the NYC "ACP" forms. We do not.

The attached memos are prepared in lieu of the ACP forms. We have been using them for close to two years. As I indicated, we, the WT Department via a Call-in abatement contractor, performs the required abatements.

Phil
9/27/00

THE PORT AUTHORITY OF NY & NJ **Memorandum**

TO: Abraham Friedman
FROM: Joe Amatuccio
DATE: September 27, 2000

SUBJECT: ASBESTOS DISCLOSURE:
Two World Trade Center: 27th Floor.

COPY: A. Burton, J. Ciccolello, T. Lynch, E. Monteverde, P. Taylor, F. Varriano, L. Zucchi

Regarding your inquiry as to the presence of asbestos-containing building materials present on the 27th floor in Two World Trade Center, our site survey and bulk sampling data base indicates the following:

On the 27th floor, there is no asbestos-containing sprayed-on fireproofing or thermal system insulation material present, as defined by the U.S. Environmental Protection Agency standard 40 CFR Part 61: National Emissions Standard For Hazardous Air Pollutants; Asbestos – Final Rule and the U.S. Occupational Safety and Health Administration standard 29 CFR 1910.1001: Asbestos, within the leasehold area. Asbestos-containing sprayed-on fireproofing is however present behind the core walls, but not the within the core's plenum. Vinyl asbestos floor tiles have been identified on the west, east, and south quadrants of the floor.

Should you have any questions, please contact me at x 2704.

Joe Amatuccio
Manager,
Operations & Maintenance Management

THE PORT AUTHORITY OF NY & NJ **Memorandum**

TO: Joanne Ciccollo
FROM: Joe Amatuccio
DATE: September 27, 2000

SUBJECT: ASBESTOS DISCLOSURE:
One World Trade Center: 33rd and 34th Floors.

COPY: A. Burton, T. Lynch, E. Monteverde, P. Taylor, F. Varriano, L. Zucchi

Regarding your inquiry as to the presence of asbestos-containing building materials present on the 33rd and 34th floors in One World Trade Center, our site survey and bulk sampling data base indicates the following:

On the 33rd floor, there is no asbestos-containing sprayed-on fireproofing or thermal system insulation material present, as defined by the U.S. Environmental Protection Agency standard 40 CFR Part 61: National Emissions Standard For Hazardous Air Pollutants; Asbestos – Final Rule and the U.S. Occupational Safety and Health Administration standard 29 CFR 1910.1001: Asbestos, within the leasehold area. Asbestos-containing sprayed-on fireproofing is however present behind the core walls, but not the within the core's plenum. Vinyl asbestos floor tiles have been identified on the northwest quadrant of the floor.

On the 34th floor, there is no asbestos-containing sprayed-on fireproofing or thermal system insulation material present, as defined by the U.S. Environmental Protection Agency standard 40 CFR Part 61: National Emissions Standard For Hazardous Air Pollutants; Asbestos – Final Rule and the U.S. Occupational Safety and Health Administration standard 29 CFR 1910.1001: Asbestos, within the leasehold area. Asbestos-containing sprayed-on fireproofing is however present behind the core walls, but not the within the core's plenum. There is are no vinyl asbestos floor tile present.

Should you have any questions, please contact me at x 2704.

Joe Amatuccio
Manager,
Operations & Maintenance Management

The Port Authority of NY & NJ MEMORANDUM

TO: Joe Amatuccio
FROM: Phil Taylor
DATE: August 28, 2000

SUBJECT: ASBESTOS SIGNS.

COPY: F. Varriano, L. Zucchi

In U.S. OSHA standard 29 CFR 1910.1001: Asbestos, section (j)(3)(v), the building owner shall "At the entrance to mechanical rooms/areas in which employees reasonably can be expected to enter and which contain ACM and/or PACM, the building owner shall post signs which identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that ACM and/or PACM will not be disturbed...."

In section (j)(4)(i and ii), OSHA goes on to define the wording of the required label and/or sign as follows:

DANGER

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

CANCER AND LUNG DISEASE HAZARD

This label/sign must be affixed/posted so that it is clearly noticed by employees upon entrance into an area containg ACM and/or PACM.

A few years ago, the PA drafted a warning sign meeting the intent of OSHA. The following was prepared by the former Office of Environmental Policy and Management, and approved by the Law Department for use at PA facilities.

DANGER

ASBESTOS-CONTAINING MATERIAL PRESENT ON STRUCTURAL AND MECHANICAL SYSTEMS

AVOID CREATING DUST

CANCER AND LUNG DISEASE HAZARD

DO NOT DISTURB OR PROCEED WITH REPAIR, RENOVATION, MAINTENANCE, CONSTRUCTION, OR DEMOLITION WORK WITHOUT PROPER AUTHORIZATION, TRAINING AND EQUIPMENT.

FOR FURTHER INFORMATION CALL THE SUPERVISING ENGINEER'S OFFICE AT 435-8507 OR 435-2978

Black Type on a Yellow Background.

I recommend that we post this sign in the following locations:

1) Access ways into the MERs
2) Within asbestos-containing elevator pits and shafts
3) Access way into the Catwalks
4) Truckdock

Please let me know what you think.

Phil Taylor

O.K. to Proceed.

TO: LIZ

Taylor, Phillip CC: LENNY, JOE

Subject: ASBESTOS SIGNS.

I would like the PA Sign Shop to fabricate the attached asbestos sign ← example given D Lay

The print must be black, all capitals, and standard lettering font.

The background must be yellow.

The sign needs to be printed in landscape and portrait.

Holes need to be punched at each corner for mounting.

I would like to look at an example of the sign before mass production.

Eventually, we will need 100 signs; 50 landscape and 50 portrait.

Thanks,

Phil

PT.
9/27/00

APPENDIX H-7.3

Memorandum Regarding Asbestos Positive Locations at the WTC Update

THE PORT AUTHORITY OF NY & NJ MEMORANDUM

TO: Joseph Amatuccio, Carla Bonacci, Jerrold Dinkels, Frank DiMartini, Eric Hauser, Louis Menno, Edwin Monteverde, Francis Riccardelli, Nancy Seliga
FROM: John Castaldo
DATE: September 19, 2000

SUBJECT: **ASBESTOS POSITIVE LOCATIONS AT THE WORLD TRADE CENTER: UPDATE.**

REFERENCE: J. Castaldo to Addressees; Memorandums Dated 5/4/98 and 12/21/99; Same Subject.

COPY: L. Ardizzone, S. Benjamin, I. Chachkes, J. Connors, W. Devlin, M. Finegold, M. Hurley, M. Jakubek, M. Kirshner, T. Lynch, U. Mehta, G. Meyer, R. Muessig, C. Nanninga, A. Reiss, E. Strauss, G. Tabek, P. Taylor, F. Varriano, L. Zucchi, Operations Control Desk, S-4's

Attached please find an update to my initial May, 1998 memorandum wherein the known asbestos locations at the World Trade Center were disclosed. The information provided in this disclosure is a compulation of avaliable bulk sampling and analytical results from both the World Trade and Engineering Departments' data bases.

In compliance with the disclosure requirements of the U.S. Occupational Safety and Health Administration's asbestos standard, I am requesting that this information be distributed to all World Trade Department, Engineering Department, PA Office Space, and Leasing Division property managers, project managers, construction managers, construction inspectors, operations supervisors, security supervisors, facility maintanence supervisors, and leasing agents associated with the allocation of space, and the design and implementation of World Trade Center projects. Additionally, please forward this information to those contractors under your administration. If there are questions as to the presence of asbestos-containing materials at a particular location, or if the scope of demolition and/or renovation work may impact asbestos-containing materials, please contact Art Burton, Assistant Environmental Coordinator, at 435-8364.

Those on the copyline are requested to contact this office for the appropriate response action if asbestos-containing materials may be impacted by work under your jurisdiction. The Port Authority complies with Industrial Code Rule #56 relative to worker certifications, contractor licensing, and work procedures if asbestos is going to be disturbed or impacted. Please contact me at 435-8518 should you have any questions.

John Castaldo
General Manager,
Base Building Services

Asbestos-Containing Surfacing And/Or Thermal System Insulation Materials Located In One World Trade Center - Exclusive Of Elevator Shafts

Full Floor Locations	Random Locations On Floor	Subgrades	Convector Units
- Lobby Mezzanine	- 43rd / 44th Floor PA Exhaust Duct	- B1 Level:	- 77th Floor
- 1st - 6th Floors: Core	- 82nd Floor	- Core, N/E Quadrant	- 79th Floor
- 6th Floor Catwalk	- 104th Floor	- B6 Level	- 88th Floor
- 7th / 8th Floor MER	- Core Electric Closets		- 101st Floor
- 41st / 42nd Floor MER	On The 1st – 40th floors		- 103rd Floor
- 75th / 76th Floor MER	- Perimeter Electric Closets On The		- 105th floor
- 108th / 109th Floor MER	30th Floor		

Asbestos-Containing Surfacing And/Or Thermal System Insulation Materials Located In Two World Trade Center - Exclusive Of Elevator Shafts

Full Floor Locations	Random Locations On Floor	Quadrant Location	Convector Units
- 6th Floor Catwalk	- Lobby Mezzanine	- S/W, 43rd Floor	- 22nd Floor
- 10th – 13th Floors	- 7th / 8th Floor MER	Kitchen Exhaust Duct	- 24th Floor
(Bell Atlantic)	- 9th Floor		- 59th Floor
- 41st / 42nd Floor MER	- 19th Floor		- 72nd Floor
	- 20th Floor		- 79th Floor
	- 26th Floor		- 81st Floor
	- 33rd Floor		- 84th Floor
	- 71st Floor		- 86th Floor
	- 75th / 76th Floor MER		- 87th Floor

Asbestos-Containing Surfacing And/Or Thermal System Insulation Materials Located In Four And Five World Trade Center

There is no asbestos-containing sprayed-on fireproofing in Four and Five World Trade Center.
A cementitious patch has been identified on a beam in the south wing of the southwest portion on the 5th floor in 5 WTC.
Thermal system insulation is present in the form of pipe saddles.

Asbestos-Containing Surfacing And/Or Thermal System Insulation Materials Located On The Concourse

There is no asbestos-containing sprayed-on fireproofing in the plenum of the Concourse.
Thermal system insulation material is present.
ACM

Asbestos-Containing Surfacing And/Or Thermal System Insulation Materials Located On The B1 Level And The Truckdock

Asbestos-containing sprayed-on fireproofing and thermal system insulation material is present.

Miscellaneous Asbestos-Containing Materials At The World Trade Center

Base building flooring throughout the facility is vinyl asbestos floor tile (VAT).

World Trade Center Elevator Shafts With Asbestos-Containing Surfacing Insulation Material

One World Trade Center

Pits and Shafts

1 / 2	39 / 40 / 41
3 / 4	42 / 43 / 44
5 / 48	45 / 46 / 47
8 / 9	51 / 52 / 53
16 /17	54 / 55 / 56
49	57 / 58 / 59
18 / 19	60 / 61 / 62
20 / 21	63 / 64 / 65
22 / 23	66 / 67 / 68
50	69 / 70 / 71
24 / 25 / 26	72 / 73 / 74
27 / 28 / 29	
30 / 31 / 32	
33 / 34 / 35	
36 / 37 / 38	

Two World Trade Center

Pits and Shafts

5 / 48	36 / 37 / 38
10 / 11	39 / 40 / 41
14 / 15	42 / 43 / 44
24 / 25 / 26	45 / 46 / 47
27 / 28 / 29	54 / 55 / 56
30 / 31 / 32	57 / 58 / 59
33 / 34 / 35	63 / 64 / 65

There is no asbestos-containing surfacing insulation material in the J and K elevator cars in 1 and 2 WTC.

There is no asbestos-containing surfacing insulation material with the elevator shafts in 4 and 5 WTC.

APPENDIX H-7.4

1999 Year End Environmental Summary Report,
Sections 3 & 5

- SECTION THREE -

WORLD TRADE CENTER ENVIRONMENTAL PROGRAMS
1999 YEAR END REPORT

The attached 1999 Year End Report summarizes the environmental activities within the World Trade Department's Supervising Engineer's Office. The report's Table Of Content is as follows:

Section One: Program Highlights

I. Asbestos Program

1) Asbestos Abatement Projects
2) World Trade Center Asbestos Disclosure
3) Elevator Shaft Assessment
4) Preparation of the New World Trade Center Call-in Contract

II. Safety Program

1) ABM Engineering Site Safety Program

III. Environmental Program

1) Hazardous Waste Management
2) Community-right-To-Know Inspections
3) Food Establishment Inspection Program
4) Indoor Air Quality Program

IV. Management Plans Initiated in 1999

1) World Trade Center Hazardous Waste Management Plan
2) World Trade Center Compressed Gas Safety Plan

V. Objectives For 2000

VI. Program Evaluation

VII. Workplace Conduct

Section Two: Attachments

The Port Authority of NY & NJ Memorandum

TO: John Castaldo, Lee Zucchi
FROM: Art Burton, Pete Negron, Phil Taylor
DATE: January 5, 2000

SUBJECT: **ENVIRONMENTAL PROGRAMS YEAR END REPORT.**

Attached please find the subject report.

Prepared By:

Art Burton,
Assistant Environmental
Programs Coordinator

Pete Negron,
Asbestos Programs Coordinator

Phil Taylor,
Environmental Programs Coordinator

ASBESTOS AND ENVIRONMENTAL PROGRAMS 1999 YEAR END REPORT

TABLE OF CONTENTS

Section One: Program Highlights.

I) Asbestos Program

1) Asbestos Abatement Projects
2) World Trade Center Asbestos Disclosure
3) Elevator Shaft Assessment
4) Preparation Of The New World Trade Center Call-in Contract

II) Safety Program

1) ABM Engineering Site Safety Program

III) Environmental Program

1) Hazardous Waste Management
2) Community Right-To-Know Inspections
3) Food Establishment Inspection Program
4) Indoor Environmental Quality Program

IV) Management Plans Initiated in 1999

1) World Trade Center Hazardous Waste Management Plan
2) World Trade Center Compressed Gas Safety Plan

V) Objectives For 2000

VI) Program Evaluation

VII) Workplace Conduct

Section Two: Attachments.

- 1999 Asbestos Projects
- World Trade Center Asbestos Disclosure Report
- Elevator Shaft Assessment Report
- World Trade Center Asbestos Abatement Contract Administration
- US EPA Community Right-To-Know Memorandum
- World Trade Center Food Inspection Program
- Hazardous Waste Plan Table of Contents
- World Trade Center Safety Committee

I) ASBESTOS PROGRAM

1) Asbestos Abatement Projects:

In 1999, a total of 130 asbestos abatement projects were performed under World Trade Department contract WTC - 115.295. The cost associated with this work was $2.2 million. In addition, a total of 1,600 cubic yards of asbestos waste was generated.

In summary, 48 vinyl asbestos floor tile projects, 40 fireproofing removals via tent enclosure removal, 17 elevator release responses, 18 surface clean-ups, and 7 Capital projects were performed. The table in Section Two: Attachments – **1999 Asbestos Projects**, describes each project.

2) World Trade Center Asbestos Disclosure:

In accordance with the US Department of Labor's Occupational Safety and Health Administration asbestos regulation 29 CFR 1926.1101: Asbestos in Construction, sections (b): Definitions, and (d)(1-5): Multi-employer worksites, as the building owner the World Trade Department is required to disclose the presence of known or presumed asbestos-containing building materials. The memorandum in Section Two: Attachments – **World Trade Center Asbestos Disclosure Report**, was prepared to notify all concerned parities as to the known locations of asbestos-containing building materials.

3) Elevator Shaft Assessment:

With the assistance of World Trade Vertical Transportation, a condition survey was performed in 22 high rise elevator shafts to explore the control options (full scale removal, localized removal, operations & maintenance response, management-in-place) available to the World Trade Department.

The report in Section Two: Attachments – **Elevator Shaft Inspections**, details the findings. In summary, it was recommended that the asbestos in elevator shafts 22/23A, 10/11B, and 5/48B be completely removed due to signs of delamination. The asbestos in the remaining elevator shafts was found to be intact, and can be controlled by management-in-place practices, and operations & maintenance responses.

4) **Preparation of the New WTC Call-In Contract:**

The World Trade Department's Call-in asbestos abatement contract expired on December 3, 1999. Following discussions with the Engineering Department, it was decided that the Environmental Construction Division of the Engineering Department would administer the next contract for the World Trade Department. Working closely with the Engineering Department's Project, Construction, and Design Divisions, a new contract was developed expanding upon the scope of the previous Call-in contract.

Supplementing the Port Authority's technical specification for "Asbestos Abatement and Disposal, this contract includes all of the applicable variances for the World Trade Center; Vinyl Asbestos Floor Tile Removal Utilizing Dry Ice, Tent Enclosure For The Removal of Fireproofing and Thermal System Insulation, and Application of Spray Encasement To Fireproofing.

World Trade Contract 115.300 was awarded to the asbestos abatement firm of Comprehensive Environmental of New York (CENY). Pete Negron shall continue to coordinate abatement project requests for the World Trade Department. The memorandum in Section Two: Attachments – **World Trade Center Asbestos Abatement Projects**, outlines this change in contract administration, and the procedures to be implemented when requesting abatement work was prepared was distributed to World Trade Department and Real Estate management staff.

1999 ASBESTOS PROJECTS

PETE NL JN
ENVIRONMENTAL PROGRAMS COORDINATOR

1999 ASBEST ROJECTS
THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY
PHILIP TAYLOR - SUPERVISING ENGINEER

ARTHUI TON
ASSISTANT ENVIRONMENTAL COORDINATOR

W.O. #	PROJECT	SCOPE	TOTAL HRS	ABATED S.F.	UNIT HR/S.F.	CARPET S.F.	CARPET COST	TOTAL COST
PAYMENT NO. 1								
253	1 WTC B-2	VAT		3,475	$4.80			$ 17,895.60
256	4 WTC 7 th flr	VAT		14,250	$1.90			$ 29,010.60
252	1 WTC 54th flr	VAT		22,500	$1.90	19,000	$ 5,700.00	$ 49,665.60
259	1 & 2 WTC MER STP	CLEAN	1,136		$54.24			$ 62,832.24
260	1 WTC 53rd flr	VAT		3,200	$4.80			$ 16,575.60
196	1 WTC B-1stock	CLEAN	443		$54.24			$ 24,001.20
251	5 WTC 10th EMR	CLEAN	40		$54.24			$ 2,169.60
PAYMENT NO. 2								
261	2 WTC 34th	VAT		4,600	$4.80	500	$ 150.00	$ 23,445.60
264	4 WTC 3rd	VAT		4,350	$4.80			$ 22,095.60
251	1 WTC B-1 K-2 EMR	CLEAN	24		$54.24			$ 4,181.76
253	1 WTC B-2	VAT		2,584	$4.80			$ 12,403.20
262	2 WTC 89th flr	VAT		34,500	$1.90			$ 66,765.60
258	4 WTC B-1	VAT		580	$6.22			$ 4,823.20
259	1 & 2 WTC MER STP	CLEAN	2,420		$54.24			$ 131,260.80
196	1 WTC stock	ACM		1,660	$54.24			$ 90,038.40
267	2 WTC 28th flr	VAT		1,850	$4.80	1,000	$ 300.00	$ 10,543.60
265	1 WTC 83rd flr	VAT		6,286	$3.05	6,286	$ 1,885.80	$ 22,273.70
254	4 WTC 9th flr	VAT		7,200	$3.05			$ 23,175.60
EWO 39	4 WTC 3rd flr stair	CLEAN	28		$54.24			$ 1,518.72
PAYMENT NO. 3								
268	1 WTC 46th flr	VAT		990	$6.22	990	$ 297.00	$ 7,070.40
273	4 WTC 5 th flr	VAT		4,650	$4.80			$ 23,535.60
266	2 WTC 25th flr	VAT		33,500	$1.90			$ 64,865.60
274	1 WTC 51th flr	VAT		3,700	$4.80	850	$ 255.00	$ 19,230.60
196	1 WTC B-1 stock	ACM	2,790		$54.24			$ 151,302.48
EWO 040	2 WTC 6th flr	CLEAN	24		$54.24			$ 1,301.76
EWO 041	2 WTC elev 37 & 38th flr	CLEAN	8		$54.24			$ 433.92
112	1 WTC mezz DR RM	ACM	33		$54.24			$ 18,209.40
234	1 WTC B-1 lev subs	ACM	94		$54.24			$ 14,500.00
271	4 WTC conc	VAT		220	$6.22			$ 1,624.00
263	1 WTC corE closets	CLEAN	100		$54.24			$ 5,857.92

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PAYMENT NO. 4								
196	1 WTC B-1 stock	ACM	1,310		$54.24			$ 71,054.40
257	1 WTC B-2 shop	CLEAN	883		$54.24			$ 48,149.52
269	1 WTC 101st flr	VAT	1,177		$54.24			$ 65,056.08
270	2 WTC B-4	VAT		7,200	$3.05			$ 23,175.60
276	1 WTC mezz post	CLEAN	48		$54.24			$ 2,603.52
278	2 WTC B-6	SPOT	80		$54.24			$ 4,339.20
279	2 WTC 88th flr	VAT		34,600	$1.90	6,500	$ 1,950.00	$ 68,905.60
280	2 WTC 34th flr	VAT		2,225	$4.80	480	$ 135.00	$ 10,815.00
283	1 WTC 108th flr	VAT		600	$6.22			$ 4,347.60
284	1 WTC B-6	VAT		1,600	$4.80			$ 8,895.60
285	1 WTC mezz DR RM	ACM		310.50	$54.24			$ 16,977.12
287	1 WTC mezz tank	SPOT	48		$54.24			$ 2,603.52
288	1 WTC B-1	CLEAN	16		$54.24			$ 867.84
EWO 042	1 WTC elev 49 & 50	CLEAN	8		$54.24			$ 433.92
EWO 043	2 WTC 5th flr	CLEAN	16		$54.24			$ 867.84
PAYMENT NO. 5								
116.097	1 WTC B-1	VAT		30	$6.22			$ 2,000.60
116.099	1WTC 22nd	VAT		1,400	$4.80	900	$ 270.00	$ 8,025.60
116.096	2 WTC 34th flr	VAT		200	$6.22			$ 1,379.60
116.094	2 WTC 26th flr	VAT		3,200	$1.90	2,500	$ 7,500.00	$ 69,515.60
EWO 050	1 WTC elev 22 & 23	CLEAN	16		$54.24			$ 867.84
EWO 049	1 WTC elev 19	CLEAN	39		$54.24			$ 2,115.36
EWO 048	5 WTC 2nd flr	CLEAN	104		$54.24			$ 5,640.96
116.1	1 WTC 85th flr	VAT		2,800	$4.80			$ 14,655.60
EWO 057	1 WTC elev 16 & 17	CLEAN	136		$54.24			$ 7,376.64
116.091	6 WTC B-1 sub	ACM	807.50		$54.24			$ 62,409.60
293	1 & 2 conc lights	CLEAN			NET			$ 1,721.17
PAYMENT NO.6								
272	4 WTC 7th flr	VAT		13,690	$1.90			$ 27,226.60
116.09	2 WTC 53rd flr	VAT		15	$6.22			$ 2,289.90
293	1 & 2 WTC	CLEAN			$54.24			$ 3,254.40
EWO 045	1 WTC elev 16 & 17	CLEAN	109		$54.24			$ 5,912.16
EWO 046	2 WTC elev 33-35	CLEAN	44		$54.24			$ 2,386.56
EWO 047	1 WTC 18-19	CLEAN	24		$54.24			$ 1,301.76

64,745 ft

PETE NE..ON
ENVIRONMENTAL PROGRAMS COORDINATOR

1999 ASBEST ROJECTS
THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY
PHILIP TAYLOR - SUPERVISING ENGINEER

ARTHUI TON
ASSISTANT ENVIRONMENTAL COORDINATOR

PAYMENT NO. 7								
EWO 051	1 WTC elev 16 & 17	CLEAN	136		$54.24			$ 7,376.64
116.094	2 WTC 26th flr	VAT		32,000	$1.90	25,000	$ 7,500.00	$ 69,515.60
116.096	2 WTC 34th flr	VAT		200	$6.22			$ 1,379.60
116.097	1 WTC B-3	VAT		300	$6.22			$ 2,001.60
116.099	1 WTC 22nd flr	VAT		1,400	$4.80	900	$ 270.00	$ 8,205.60
116.1	1 WTC 85th flr	VAT		2,800	$4.80			$ 14,655.60
EWO 048	5 WTC 2nd flr	CLEAN	104		$54.24			$ 5,640.96
EWO 049	1 WTC elev 19th flr	CLEAN	39		$54.24			$ 2,115.36
116.091	6 WTC B-1 sub	ACM	803		$54.24			$ 62,409.60
EWO 50	1 WTC elev 22-23	CLEAN	16		$54.24			$ 867.84
293	1 & 2 WTC conc. Lights	CLEAN			NET			$ 1721.17
PAYMENT NO. 8								
116.102	WTC conc.	VAT		384	$6.22			$ 3,004.08
116.092	1 WTC 102nd flr	VAT		23,400	$1.90			$ 45,675.60
116.103	1 WTC B-4	VAT		1,700	$4.80			$ 9,375.60
116.095	1 WTC 104th flr	VAT		550	$6.22			$ 4,036.60
245	1 WTC 42nd MER	ACM	466		$54.25			$ 25,275.84
116.091	6 WTC B-1 sub	ACM	1,677		$54.25			$ 90,960.48
EWO 052	1 WTC elev 16 & 17	CLEAN	67		$54.25			$ 3,634.08
PAYMENT NO. 9								
116.105	2 WTC 75th flr	ACM	473		$54.25			25.655.52
116.11	1 & 2 B-1 dust	DUST	842		$54.25			45.670.08
116.104	2 WTC 22nd	VAT		1,850	$4.80			$ 10,095.00
116.108	2 WTC 27th flr	VAT		12,008	$1.90			$ 24,030.80
116.091	6 WTC B-1 sub	ACM	623.5		$54.25			$ 46,130.23
116.101	1 WTC B-6	CLEAN	456		$54.22			$ 24,733.44
PAYMENT NO.10								
EWO 053	WTC FLOYD	STANDBY	169		$54.24			$ 9,139.44
116.11	1 & 2 WTC B-1 test	CLEAN	224		$54.24			$ 12,149.76
116.115	1 WTC 79th flr	VAT		3,690	$4.80			$ 18,927.60
116.112	2 WTC 75th flr	VAT		430	$6.22			$ 3,290.20
116.114	1 WTC B-6	CLEAN	74		$54.24			$ 4,013.76
116.113	1 & 2 WTC catwalk	CLEAN	468		$54.24			$ 28,384.32
116.107	2 WTC B-2	VAT		1,500	$4.80			$ 8,415.60

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116.116	1 WTC 41st MER	ACM	192		$54.24			$ 10,414.08
PAYMENT NO.11								
116.107	2 WTC B-2 LVL corridor	VAT		1,030	$4.80			$ 4,944.00
116.122	1 WTC B-1 LVL MER	CLEAN	48		$54.24			$ 2,603.52
116.119	1 WTC 18th MER	CLEAN	48		$54.24			$ 2,603.52
116.113	1 & 2 WTC catwalk	CLEAN	708		$54.24			$ 38,401.92
PAYMENT NO.12								
275	1 WTC 87th flr	DOL FILING						$ 1,215.60
116.093	5 WTC 2nd flr	DOL FILING						$ 1,215.60
116.11	1 WTC 91st flr	DOL FILING						$ 1,215.60
116.117	4 WTC 5 th flr	VAT		35,000	$1.90			$ 70,427.60
116.12	4 WTC B-1	VAT		1,080	$4.80			$ 6,399.60
116.123	1 WTC 104th flr	SPOT	27		$54.24			$ 1,461.48
116.124	1 & 2 WTC freight	VAT		550	$6.22			$ 4,036.60
116.125	2 WTC 37th flr	DOL FILING						$ 1,215.60
116.126	1 WTC 86th flr	DOL FILING						$ 1,215.60
116.127	5 WTC 5th flr	VAT		13,500	$1.90			$ 26,865.60

52,050

TOTAL: 334,515

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THE PORT AUTHORITY OF NY & NJ **MEMORANDUM**

TO:	Jerrold Dinkles, Louis Menno, Edwin Monteverde, Nancy Seliga.
FROM:	John Castaldo
DATE:	December 21,1999
SUBJECT:	**ASBESTOS POSITIVE LOCATIONS IN THE WORLD TRADE CENTER: UPDATE.**
REFERENCE:	**J. Castaldo to T. Stam, memo dated 10/7/98, 5/4/98 , 2/12/98, same subject.**
COPY:	J. Amatuccio, L. Ardizzone, E. Auerbach, S. Benjamin, V. Borst, C. Bonacci, I. Chachkes, C. DaCosta, F. DeMartini, W. Devlin, J.DiSorbo, M.Hurley, M. Jakubek, U. Mehta, Meyer, E. McGinnley, R. Muessig, J. Napolitano, P. Negron, R. Pruno, F. Riccardelli, J. Richardson, C. Semah, E. Strauss, P. Taylor, G. Tabeek, L. Zucchi, Operations Control Desk, S-4's.

This memorandum is an update to my May, 1998 memorandum wherein I disclosed the known asbestos locations in the World Trade Center.

The S/E quadrant of the 104th in One World Trade Center floor has been abated, and has been removed from the Quadrant Location heading.

The Port Authority has been trying to comply with Industrial Code Rule #56 relative to worker certifications, contractor licensing, and work procedures if asbestos is going to be disturbed or impacted. You are requested to contact this office for the appropriate response action *(facility operations & maintenance activity, or referral to the Engineering Department for abatement)* if asbestos-containing materials may be impacted by work under your jurisdiction.

In compliance with the World Trade Department's asbestos disclosure requirements under the U.S. Occupational Safety and Health Administration asbestos regulation, I am requesting that this information be distributed to all World Trade Department maintenance and construction contractors, tenant contractors, and Engineering Department construction contractors.

Please contact me at 8518, or Pete Negron at 8364 if you have any questions.

John Castaldo
General Manager,
Building Services Management

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located In *One World Trade Center - Exclusive Of Elevator Shafts*

Full Floor Locations	Quadrant Location	Random Locations On Floor	Subgrades
Lobby Mezzanine 1st - 6th Floors: Core 6th Floor Catwalk		43 / 44 Floor Exhaust Duct 72nd Floor 82nd Floor	B1 Level: Core, North/ West/East Quadrant,
7 / 8 Floor MER 41 / 42 Floor MER 75 / 76 Floor MER 108 / 109 Floor MER		Core Electric Closets On The 1st - 40th Floors Perimeter Electric Closet On The 30th Floors	B2 Level: Old Locksmith And B6 Level

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located In *Two World Trade Center - Exclusive Of Elevator Shafts*

Full Floor Locations	Random Locations On Floor	Quadrant Location
6th Floor Catwalk 10th - 13th Floors 41 / 42 Floor MER	Lobby Mezzanine 7 / 8 Floor MER 9th Floor 19th Floor 20th Floor 26th Floor 33rd Floor 71st Floor 75 / 76 Floor MER	S/W, 43rd Floor

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located In Four And Five World Trade Center

There is no asbestos-containing sprayed-on fireproofing in Four and Five World Trade Center.
Thermal system insulation is present in the form of pipe saddles.

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located On The Concourse

There is no asbestos-containing sprayed-on fireproofing in the plenum of the Concourse.
There is thermal system insulation material present.
ACM

Asbestos-Containing Surfacing And Thermal System Insulation Materials Located On The B1 Level And The Truckdock

Asbestos-containing sprayed-on fireproofing and thermal system insulation material is present.

Miscellaneous Asbestos-Containing Materials At The World Trade Center

Base building flooring throughout the facility is vinyl asbestos floor tile (VAT).

ACBM is located behind the convector units at the following locations:
1 WTC; 77, 79, 88, 101, 103 and 105.
2 WTC; 22, 24, 59, 72, 79, 81, 84, 86 and 87.

World Trade Center Elevator Shafts With Asbestos-Containing Insulation Material

One World Trade Center

Shafts	1 - 5:	Elevator Pit to EMR
	8 - 9:	Elevator Pit to EMR
	16 - 21:	Elevator Pit to 32nd Floor
	22 - 23:	Elevator Pit to EMR
	48:	Elevator Pit to EMR
	49:	Elevator Pit to 32nd Floor
	50:	Elevator Pit to 31st Floor
	24 - 29:	Elevator Pit to EMR
	30 - 35:	Elevator Pit to EMR
	36 - 41:	Elevator Pit to EMR
	42 - 47:	Elevator Pit to EMR
	51 - 56:	Elevator Pit to EMR
	57 - 62:	Elevator Pit to EMR
	63 - 68:	Elevator Pit to EMR
	69 - 74:	Elevator Pit to EMR

Two World Trade Center

Shafts	5 & 48:	Elevator Pit to EMR
	10 & 11:	Elevator Pit to EMR
	14 & 15:	Elevator Pit to EMR
	24 - 29:	Elevator Pit to EMR
	30 - 35:	Elevator Pit to EMR
	36 - 41:	Elevator Pit to EMR
	42 - 47:	Elevator Pit to EMR
	51 - 56:	Elevator Pit to EMR
	57 - 62:	Elevator Pit to EMR
	63 - 68:	Elevator Pit to EMR
	69 - 74.	Elevator Pit to EMR

There is no asbestos-containing insulation material in the J and K elevator cars in 1 and 2 WTC.

There is no asbestos-containing insulation material with the elevator shafts in 4 and 5 WTC.

THE PORT AUTHORITY OF NEW YORK & NEW JERSEY

MEMORANDUM

TO: Phil Taylor-Supervising Engineer.

FROM: Pete Negron

DATE: July 21, 1999

SUBJECT: **Elevator Shaft Asbestos Assessment.**

REFERENCE: **Attached E-Mail**

COPY TO: J. Amatuccio, D. Bobbitt, A. Burton, J. Castaldo, F. Riccardelli, L. Zucchi.

During the week of July 21, 1999, I inspected the elevator shafts to assess the condition of the fireproofing on the steel members.

The attached report includes the shaft number, floor and condition of fireproofing: intact or delaminated, and recommended action.

Floors not listed were inspected and found to be acceptable in that the fireproofing was intact.

In summary, of the 22 shafts inspected, shafts, which require full-scale abatement, are shafts 22/23A, 10B and 48B.

If you require further information regarding this report please contact me at 1.212.435.8364.

Pete Negron
Associate Environmental Analyst
Operations & Maintenance Management
World Trade Center

Attachment

WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
25	1A	NO	YES	24 S.F.	SEAL EDGES
26	1A	NO	YES	12 S.F.	SEAL EDGES
27	1A	NO	YES	30 S.F.	SEAL EDGES
28	1A	NO	YES	12 S.F.	SEAL EDGES
29	1A	NO	YES	48 S.F.	SEAL EDGES
SPRAY-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
9	2A	NO	YES	24 S.F.	SEAL EDGES
27	2A	NO	YES	4 S.F.	SEAL EDGES
28	2A	NO	YES	4 S.F.	SEAL EDGES
29	2A	NO	YES	4 S.F.	SEAL EDGES
30	2A	NO	YES	24 S.F.	SEAL EDGES
31	2A	NO	YES	24 S.F.	SEAL EDGES
34	2A	NO	YES	36 S.F.	SEAL EDGES
38	2A	NO	YES	6 S.F.	SEAL EDGES
SPRAY-ON MATERIAL					

2A

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
310	3A	NO	YES	72 S.F.	SEAL EDGES
5	3A	NO	YES	34 S.F.	SEAL EDGES
8	3A	NO	YES	48 S.F.	SEAL EDGES
9	3A	NO	YES	48 S.F.	SEAL EDGES
16	3A	NO	YES	30 S.F.	SEAL EDGES
17	3A	NO	YES	48 S.F.	SEAL EDGES
18	3A	NO	YES	48 S.F.	SEAL EDGES
19	3A	NO	YES	72 S.F.	SEAL EDGES
28	3A	NO	YES	48 S.F.	SEAL EDGES
34	3A	NO	YES	72 S.F.	SEAL EDGES
40	3A	NO	YES	6 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	4A	YES	NO	NONR	NONE
CEMENTITIOUS MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	5A	YES	NO	NONE	NONE
ALL	4BA	YES	NO	NONE	NONE
CEMENTITIOS MATERIAL					

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
22	8A	NO	YES	72 S.F.	SEAL EDGES
33	8A	NO	YES	48 S.F.	SEAL EDGES
36	8A	NO	YES	4 S.F.	SEAL EDGES
38	8A	NO	YES	48 S.F.	SEAL EDGES
39	8A	NO	YES	48 S.F.	SEAL EDGES

SPRAY-ON MATERIAL

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
7	9A	NO	YES	2 S.F.	SEAL EDGES
13	9A	NO	YES	2 S.F.	SEAL EDGES
24	9A	NO	YES	3 S.F.	SEAL EDGES
31	9A	NO	YES	4 S.F.	SEAL EDGES
34	9A	NO	YES	6 S.F.	SEAL EDGES
36	9A	NO	YES	6 S.F.	SEAL EDGES
39	9A	NO	YES	48 S.F.	SEAL EDGES
41	9A	NO	YES	48 S.F.	SEAL EDGES
43	9A	NO	YES	48 S.F.	SEAL EDGES

SPRAYED-ON MATERIAL

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
9	16A	NO	YES	24 S.F.	SEAL EDGES
25	16A	NO	YES	18 S.F.	SEAL EDGES
26	16A	NO	YES	28 S.F.	SEAL EDGES
27	16A	NO	YES	48 S.F.	SEAL EDGES
28	16A	NO	YES	24 S.F.	SEAL EDGES

CEMENTITIUOS MATERIAL

FLOORS	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	17A	YES	NO	NO	NONE

FLOORS	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	18A	X	NO	NONE	NONE

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT 1 WTC	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
8	19A	NO	YES	16 S.F.	SEAL EDGES
10	19A	NO	YES	24 S.F.	SEAL EDGES
11	19A	NO	YES	24 S.F.	SEAL EDGES
19	19A	NO	YES	48 S.F.	SEAL EDGES
25	19A	NO	YES	48 S.F.	SEAL EDGES
26	19A	NO	YES	48 S.F.	SEAL EDGES
28	19A	NO	YES	24 S.F.	SEAL EDGES
30	19A	NO	YES	24 S.F.	SEAL EDGES
32	19A	NO	YES	2 S.F.	SEAL EDGES
CEMENTITIOUS MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
8	20A	NO	YES	12 S.F.	SEAL EDGES
10	20A	NO	YES	3 S.F.	SEAL EDGES
22	20A	NO	YES	3 S.F.	SEAL EDGES
23	20A	NO	YES	3 S.F.	SEAL EDGES
25	20A	NO	YES	36 S.F.	SEAL EDGES
26	20A	NO	YES	34 S.F	SEAL EDGES
27	20A	NO	YES	26 S.F.	SEAL EDGES
28	20A	NO	YES	30 S.F.	SEAL EDGES
29	20A	NO	YES	28 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
310	21A	NO	YES	24 S.F.	SEAL EDGES
2	21A	NO	YES	24 S.F.	SEAL EDGES
3	21A	NO	YES	24 S.F.	SEAL EDGES
9	21A	NO	YES	24 S.F.	SEAL EDGES
23	21A	NO	YES	24 S.F.	SEAL EDGES
29	21A	NO	YES	48 S.F.	SEAL EDGES
32	21A	NO	YES	6 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
3	22A	NO	YES	4 S F.	SEAL EDGES
4	22A	NO	YES	4 S F.	SEAL EDGES
5	22A	NO	YES	4 S F.	SEAL EDGES
6	22A	NO	YES	4 S F	SEAL EDGES
7	22A	NO	YES	4 S F.	SEAL EDGES
8	22A	NO	YES	4 S F.	SEAL EDGES
9	22A	NO	YES	4 S F.	SEAL EDGES
10	22A	NO	YES	4 S.F.	SEAL EDGES
11	22A	NO	YES	4 S F	SEAL EDGES
12	22A	NO	YES	4 S F.	SEAL EDGES
13	22A	NO	YES	4 S.F.	SEAL EDGES
14	22A	NO	YES	6 S F.	SEAL EDGES
15	22A	NO	YES	4 S.F	SEAL EDGES
16	22A	NO	YES	12 S F.	SEAL EDGES
18	22A	NO	YES	6 S.F	SEAL EDGES
19	22A	NO	YES	6 S F.	SEAL EDGES
20	22A	NO	YES	6 S F	SEAL EDGES
21	22A	NO	YES	6 S.F	SEAL EDGES
22	22A	NO	YES	6 S F	SEAL EDGES
23	22A	NO	YES	6 S F	SEAL EDGES
24	22A	NO	YES	6 S F	SEAL EDGES
25	22A	NO	YES	6 S F.	SEAL EDGES
26	22A	NO	YES	8 S F	SEAL EDGES
27	22A	NO	YES	6 S F	SEAL EDGES
28	22A	NO	YES	48 S F	SEAL EDGES
29	22A	NO	YES	6 S F	SEAL EDGES
30	22A	NO	YES	6 S F	SEAL EDGES
31	22A	NO	YES	6 S F	SEAL EDGES
32	22A	NO	YES	6 S F	SEAL EDGES
33	22A	NO	YES	6 S F	SEAL EDGES
34	22A	NO	YES	6 S F	SEAL EDGES
35	22A	NO	YES	4 S F	SEAL EDGES
36	22A	NO	YES	6 S F	SEAL EDGES
37	22A	NO	YES	6 S F	SEAL EDGES
38	22A	NO	YES	6 S F	SEAL EDGES
39	22A	NO	YES	24 S F	SEAL EDGES
40	22A	NO	YES	8 S F	SEAL EDGES
41	22A	NO	YES	8 S F	SEAL EDGES
42	22A	NO	YES	8 S F	SEAL EDGES
43	22A	NO	YES	8 S F	SEAL EDGES
44	22A	NO	YES	8 S F	SEAL EDGES
45	22A	NO	YES	8 S F	SEAL EDGES
46	22A	NO	YES	8 S F	SEAL EDGES
47	22A	NO	YES	8 S F	SEAL EDGES
48	22A	NO	YES	2 S F	SEAL EDGES
49	22A	NO	YES	6 S F	SEAL EDGES
50	22A	NO	YES	2 S F	SEAL EDGES
51	22A	NO	YES	4 S F	SEAL EDGES
52	22A	NO	YES	4 S F	SEAL EDGES
54	22A	NO	YES	4 S F	SEAL EDGES
55	22A	NO	YES	2 S F	SEAL EDGES
56	22A	NO	YES	48 S F	SEAL EDGES
58	22A	NO	YES	3 S F	SEAL EDGES
62	22A	NO	YES	2 S F	SEAL EDGES
64	22A	NO	YES	2 S F	SEAL EDGES
67	22A	NO	YES	2 S F	SEAL EDGES

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
70	22A	NO	YES	3 S.F.	SEAL EDGES
73	22A	NO	YES	2 S.F.	SEAL EDGES
78	22A	NO	YES	2 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL			ABATEMENT OF SHAFT IS RECOMMENDED		

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
16	23A	NO	YES	2 S.F.	SEAL EDGES
17	23A	NO	YES	2 S.F.	SEAL EDGES
18	23A	NO	YES	2 S.F.	SEAL EDGES
19	23A	NO	YES	2 S.F.	SEAL EDGES
20	23A	NO	YES	2 S.F.	SEAL EDGES
21	23A	NO	YES	2 S.F.	SEAL EDGES
22	23A	NO	YES	2 S.F.	SEAL EDGES
23	23A	NO	YES	2 S.F.	SEAL EDGES
24	23A	NO	YES	2 S.F.	SEAL EDGES
25	23A	NO	YES	2 S.F.	SEAL EDGES
26	23A	NO	YES	2 S.F.	SEAL EDGES
27	23A	NO	YES	2 S.F.	SEAL EDGES
28	23A	NO	YES	2 S.F.	SEAL EDGES
29	23A	NO	YES	2 S.F.	SEAL EDGES
30	23A	NO	YES	2 S.F.	SEAL EDGES
31	23A	NO	YES	2 S.F.	SEAL EDGES
32	23A	NO	YES	2 S.F.	SEAL EDGES
33	23A	NO	YES	2 S.F.	SEAL EDGES
34	23A	NO	YES	2 S.F.	SEAL EDGES
35	23A	NO	YES	2 S.F	SEAL EDGES
36	23A	NO	YES	2 S.F.	SEAL EDGES
37	23A	NO	YES	2 S.F.	SEAL EDGES
73	23A	NO	YES	1 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL			ABATEMENT OF SHAFT IS RECOMMENDED		

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
3	10B	NO	YES	6 S.F.	SEAL EDGES
4	10B	NO	YES	6 S.F.	SEAL EDGES
7	10B	NO	YES	8 S.F.	SEAL EDGES
12	10B	NO	YES	1 S.F.	SEAL EDGES
15	10B	NO	YES	2 S.F.	SEAL EDGES
19	10B	NO	YES	20 S.F	SEAL EDGES
20	10B	NO	YES	15 S.F.	SEAL EDGES
21	10B	NO	YES	26 S.F.	SEAL EDGES
22	10B	NO	YES	28 S.F.	SEAL EDGES
23	10B	NO	YES	15 S.F.	SEAL EDGES
25	10B	NO	YES	48 S.F.	SEAL EDGES
28	10B	NO	YES	4 S.F.	SEAL EDGES
29	10B	NO	YES	2 S.F.	SEAL EDGES
31	10B	NO	YES	2 S.F.	SEAL EDGES
34	10B	NO	YES	48 S.F.	SEAL EDGES
35	10B	NO	YES	48 S.F.	SEAL EDGES
36	10B	NO	YES	34 S.F.	SEAL EDGES
37	10B	NO	YES	24 S.F.	SEAL EDGES
39	10B	NO	YES	48 S.F.	SEAL EDGES
40	10B	NO	YES	48 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL			ABATEMENT OF SHAFT IS RECOMMENDED		

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
5	11B	NO	YES	1 S.F.	SEAL EDGES
12	11B	NO	YES	1 S.F.	SEAL EDGES
19	11B	NO	YES	2 S.F.	SEAL EDGES
26	11B	NO	YES	2 S.F.	SEAL EDGES
31	11B	NO	YES	48 S.F.	SEAL EDGES
33	11B	NO	YES	2 S.F.	SEAL EDGES
40	11B	NO	YES	2 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
ALL	5B	YES	NO	NONE	NONE
ALL	48B*	NO	YES	***	ABATEMENT
48B SHAFT-SPRAYED-ON FIREPROOFING					
*** 1' - FOOT STRIP ALONG LENGTH OF COLUMN MISSING					

Note. Delamination is fireproofing whether sprayed or troweled no longer present on the steel members

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WORLD TRADE CENTER
ELEVATOR SHAFTS ASBESTOS ASSESSMENT

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
3	14B	NO	YES	2 S.F.	SEAL EDGES
4	14B	NO	YES	2 S.F.	SEAL EDGES
8	14B	NO	YES	1 S.F.	SEAL EDGES
9	14B	NO	YES	1 S.F.	SEAL EDGES
10	14B	NO	YES	1 S.F.	SEAL EDGES
11	14B	NO	YES	1 S.F.	SEAL EDGES
12	14B	NO	YES	1 S.F.	SEAL EDGES
13	14B	NO	YES	1 S.F.	SEAL EDGES
14	14B	NO	YES	1 S.F.	SEAL EDGES
15	14B	NO	YES	1 S.F.	SEAL EDGES
16	14B	NO	YES	1 S.F.	SEAL EDGES
17	14B	NO	YES	1 S.F.	SEAL EDGES
18	14B	NO	YES	1 S.F.	SEAL EDGES
23	14B	NO	YES	1 S.F.	SEAL EDGES
24	14B	NO	YES	1 S.F.	SEAL EDGES
25	14B	NO	YES	1 S.F.	SEAL EDGES
26	14B	NO	YES	1 S.F.	SEAL EDGES
27	14B	NO	YES	1 S.F.	SEAL EDGES
28	14B	NO	YES	1 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

FLOOR	SHAFT	FIREPROOFING INTACT	DELAMINATION	QUANTITY DELAMINATED	RECOMMENDATION
310	15B	NO	YES	4 S.F.	SEAL EDGES
3	15B	NO	YES	2 S.F.	SEAL EDGES
4	15B	NO	YES	4 S.F.	SEAL EDGES
22	15B	NO	YES	1 S.F.	SEAL EDGES
25	15B	NO	YES	8 S.F.	SEAL EDGES
SPRAYED-ON MATERIAL					

Note: Delamination is fireproofing whether sprayed or troweled no longer present on the steel members.

THE PORT AUTHORITY OF NY & NJ MEMORANDUM

TO: C. Bonacci, F. DeMartini, G. Meyer, T. Lynch, L. Menno, E. Monteverde, R. Muessig, K. Piatt, N. Seliga, T. Sheehan
FROM: Leandro Zucchi
DATE: December 13, 1999
SUBJECT: WORLD TRADE CENTER ASBESTOS ABATEMENT PROJECTS.

COPY TO: L. Ardizzone, J. Castaldo, R. Benacchio, W. Devlin, W. Hamann, D. Karpiloff, T. Kobel, P. Negron, F. Riccardelli, J. Richardson, H. Ret, E. Strauss, P. Taylor, F. Varriano

As you may already know, the World Trade Department's Call-in asbestos abatement contract with Asbestos Containment Services Incorporated (ASCI) expired on December 3, 1999. The new World Trade Center Call-in asbestos abatement contract, WTC 115.300, will be administered by Environmental Construction Division of the Engineering Department. The new contractor is Comprehensive Environmental of New York (CENY).

In order to ensure a smooth transition we have established the following quidelines:

1. Requests for asbestos surveys, bulk sampling, and air sampling should be submitted to Pete Negron. Pete will investigate and respond accordingly.

2. Abatement projects in support of tenant lease requirements and negotiations should be addressed as follows:

   - Requests for abatement work should be submitted in writing to Pete Negron for transmittal to the Engineering Department.
   - To expedite the process, each project request should include:

     - A site drawing indicating the building, floor, work site boundary, and suite number;
     - A scope of work;
     - A demolition and renovation drawing and schedule;
     - Time allocated (start and completion dates) for asbestos abatement;
     - A charge code;
     - Contact person to arrange access;
   - Pete Negron will coordinate the work through the Engineering Department and keep you informed of its progress.

Please note that experience has shown that vinyl asbestos floor tile (VAT) projects up to 10,000 square feet requires five (5) days to perform the abatement; from 10,000 to 30,000 square feet requires ten (10) days; and full floors require fifteen (15) days. In addition to the time required to complete a VAT removal project, fifteen (15) days advanced notice is required to: (1) collect the required bulk samples; (2) notify tenants on, above and below the abatement floor of the project; (3) notify the regulatory agencies, and (4) design the project. Therefore, we recommend that you consider these factors prior to establishing your schedule.

Should you have any questions, please feel free to contact Pete Negron or me at 435-8364 or 435-5798 respectively. Meanwhile, I thank you for your attention to this matter.

Leandro Zucchi, RPA
Manager
Operations & Maint. Mgmt.

/lb

- SECTION FIVE -

ASBESTOS RECORDS

I. Asbestos Disclosure:

The attached disclosure memorandum identifies the known locations of asbestos-containg building materials in the World Trade Center, excluding Six World Trade Center.

The information contained in this disclosure memorandum (bulk sampling locations and results) were obtained from The Port Authority of NY & NJ Engineering, and Law Departments' files.

II. Project Files:

Full floor and Call-in contract asbestos abatement project files can be found in the Supervising Engineer's Office in 2 World Trade Center, Suite 3520.

III. Quantities of Asbestos Removed and Remaining:

Vinyl Asbestos Floor Tile

A total of seven (7) million square feet of vinyl asbestos floor tile (VAT) was installed in the World Trade Center at the time of it's construction (the Port Authority Law Department's Asbestos Litigation Task Force discovered a purchase order and verification of receipt for the VAT installation). According to Task Force records, as of September 1, 2000, a total of 3,381,529 square feet of VAT was removed. Based upon these figures, an additional 3.5 million square feet of VAT remains.

Sprayed-on Asbestos Fireproofing

According to Task Force records, a total of 2,184,038 square feet of asbestos-containing fireproofing was removed from the World Trade Center. Though there is no estimate as to how much sprayed-on asbestos fireproofing remains, the World Trade Department's Disclosure Memorandum identifies those existing asbestos-containing locations.

THE PORT AUTHORITY OF NY & NJ

TWO WORLD TRADE CENTER, 37TH FLOOR
NEW YORK, NY 10048

(212) 435-7000
(201) 961-6600

October 18, 2000

R. W. Crandlemere & Associates
549 Columbian Street
Suite 305
Weymounth, MA 02190

RE: **ASBESTOS DUE DILIGENCE: INFORMATION REQUEST.**

Dear Mr. Crandlemere:

Please find attached the responses to your October 12, 2000 fax wherein you requested that the available asbestos information be broken down into seven areas. In addition, responses to your general information requests are also provided.

Request: **Total remaining and total removed ACM, broken down by material types and locations, within the designated areas as much as practical (e.g. by floor number or other description; such as within pipe chase or the elevator shafts).**

The attached breakdowns for 1 WTC, 2 WTC, 4 WTC, 5 WTC, MERs, Subgrade, and Concourse disclose the estimated amounts of asbestos-containing sprayed-on fireproofing and thermal system insulation material present. Drawings identifying these asbestos locations by sample number are on file in my office. Attachments disclosing the amounts of vinyl asbestos floor tiles present as of April, 2000 are also included. These estimates were provided by the Port Authority's Engineering Department, Asbestos Litigation Task Force, and the World Trade Department.

Asbestos-containing roofing material was removed from the MER set-backs in 1 and 2 World Trade Center, and the roofs of 4 and 5 World Trade Center. The roofs of 1 and 2 World Trade Center were not sampled.

Request: **The abatement costs for work performed and anticipated future abatement costs for each type of remaining known ACM.**

From 1986 to 1999, a total thirty one (31) contracts were bid, and a total of $58.2 million dollars was spent in abatement projects. The Engineering Department estimates the cost for vinyl asbestos floor tile removal to be between $5 - $6 per square foot, sprayed-on removal to be between $20 - $25 per square foot, and thermal system insulation to be $15 per linear foot (outer diameter dependant).

As of September, 2000, a total of 2,184,038 million square feet of sprayed-on fireproofing, and 3,500,000 million square feet of vinyl asbestos floor tile was removed. According to PA records, a total of seven million square feet of vinyl asbestos floor tiles were installed in the World Trade Center.

Request: **Materials determined not to be ACM (e.g. spline ceilings, hung ceilings, wallboard, wallboard joint compound, etc., as well as areas of sprayed-on fireproofing determined not to be ACM).**

Sampling of the building materials noted above did not disclose the presence of asbestos.

Request: **Any materials that are assumed to be ACM (such as fire doors) with an estimate, if possible, of the amounts of each material.**

Our presumption as to the types of asbestos-containing building materials within the World Trade Center did not include fire doors. Based upon sample data, asbestos containing building materials appear to be limited to sprayed-on fireproofing, thermal system insulation, and floor tiles and mastic.

Request: **Asbestos litigation status.**

Your information request has been forwarded to the Port Authority's Law Department. We will notify you accordingly.

The following information is in response to your fax dated Wednesday, October 18th.

Request: PCB-containing Hydraulic Fluid.

The hydraulic fluid (hydraulic oil # 32 AW) leaking from elevator FE-5, located on the B4 Level of 1 World Trade Center does not contain PCB. I have a copy of the Material Safety Data Sheet from the distributor; Consumers Oil, 515 South First Avenue, Mt. Vernon, N.Y.. Hydraulic elevator FE - 6 in 2 World Trade Center also uses hydraulic oil # 32 AW.

Relating to the trash compactors, please note that the hydraulic fluid is ordered through the Port Authority Stockroom from an approved list of chemical products established by the Inspection & Safety Division. The hydraulic fluid used for the trash compactors is either mineral or vegetable based. Both are non-PCB products.

Request: Additional Information Regarding Radio-Frequency Testing.

I do not have a copy of, nor do I have knowledge of the March ,1999 report prepared by Denny & Associates recommending additional RF exposure monitoring. All radio-frequency documents are available for your review in the Document Room.

Please contact me at (212) 435-8507 should you have any questions or require additional information.

Phil Taylor
World Trade Operations &
Maintenance Management

Cc: J. Connors, A. Reiss, L. Zucchi

Excluding MERs, Truckdock, and Subgrade Locations

Location	Floors	Amount
Forty three floors with less than 160 sqft of sprayed-on fireproofing*:	1st - 40th floor Electric Closets, 36th Floor Perimeter Electric Closet, 82nd Floor 104th Floor	6,888 sqft
* *Classified as "Random Locations On Floor" in WTC Disclosure Memorandum*		
Six floors with less than 10 sqft of cementitious insulation behind convector units*:	77th, 79th, 88th, 101st, 103rd, and 105th Floors	60 sqft
* *Classified as "Convector Units" in the WTC Disclosure Memorandum*		
Full Floor Locations*:		
Five core floors with 12,000sqft of sprayed-on fireproofing:	1st, 2nd, 3rd, 4th, and 5th Floors	60,000 sqft
6th Floor Plus Catwalk		43,000 sqft
Lobby Mezzanine		15,000 sqft
* *Classified as "Full Floor Locations" in the WTC Disclosure Memorandum*		
PA Café Kitchen Exhaust Duct	43rd 44th Floor	1,000 lnft
Thermal System Insulation On Vertical Steam Line:	B6 108th Floor	1,430 lnft

2 W . C

Excluding MERs, Truckdock, Subgrades, and Elevator Shafts

Location	Floors	Amount
Nine floors with less than 160 sqft of sprayed-on fireproofing*:	Lobby Mezzanine, 7/8 MER, 9th, 19th, 20th, 26th, 33rd, 71st, 75/76 MER	1,440 sqft
* *Classified as "Random Locations On Floor" in WTC Disclosure Memorandum*		
Nine floors with less than 10 sqft of cementitious insulation behind convector units*:	22nd, 24th, 59th, 72nd, 79th, 81st, 84th, 86th, 87th Floors	90 sqft
* *Classified as "Convector Units" in the WTC Disclosure Memorandum*		
Full Floor Locations*:		
Four floors with 5,000 sqft of sprayed-on fireproofing:	10th – 13th Floors	20,000 sqft
6th Floor Plus Catwalk		43,000 sqft
* *Classified as "Full Floor Locations" in the WTC Disclosure Memorandum*		
Tenant Kitchen Exhaust Duct	43rd – 44th Floors	1,000 lnft
Suspect Thermal System Insulation On Vertical Steam Line:	B6 - 108th Floor	1,430 lnft

4 WTC

Excluding MERs, Truckdock, Subgrades, and Elevator Shafts

Location	Floors	Amount

There is no sprayed-on fireproofing in 4 WTC.

Thermal system insulation is in the form of pipe saddles in 4 WTC. Quantities not determined.

5 WTC

Excluding MERs, Truckdock, Subgrades, and Elevator Shafts

Location	Floors	Amount

There is no sprayed-on fireproofing in 4 WTC.

Thermal system insulation is in the form of pipe saddles in 4 WTC. Quantities not determined.

A cementitious patch of less than 160 sqft exists on a beam in the south wing of the southwest portion of the 5th floor in 5 WTC.

1, 2, 4, and 5 WTC

Mechanical Equipment Rooms

1 WTC:

7th / 8th Floor MER	25,000 sqft of sprayed-on / TSI present but quantity unknown
41st / 42nd Floor MER	25,000 sqft of sprayed-on / " " " " "
75th / 76th Floor MER	25,000 sqft of sprayed-on / " " " " "
108th / 109th Floor MER	25,000 sqft of sprayed-on / " " " " "
TOTAL:	100,000 sqft of sprayed-on / TSI quantity unknown*

* Non-fiberglass wrapped piping components, such as elbows, fittings, and flanges contain asbestos.

2 WTC:

41st / 42nd Floor MER	25,000 sqft of sprayed-on / TSI present but quantity unknown
TOTAL:	25,000 sqft of sprayed-on / TSI quantity unknown*

* Non-fiberglass wrapped piping components, such as elbows, fittings, and flanges contain asbestos.

4 WTC:

Non-ACM

5 WTC:

Non-ACM

1, 2, 4, and 5 WTC

SUBGRADES and TRUCKDOCK

Subgrades -

1 WTC:

B1 Level – Core, and N/E Quadrant	5,000 sqft / No TSI
B6 Level – Entire Level	40,000 sqft / No TSI
TOTAL:	45,000 sqft / No TSI

2, 4, and 5 WTC: No ACM

Truckdock -

Main Truckdock	50,000 sqft

PLAZA and CONCOURSE

There is no sprayed-on asbestos containing fireproofing on the Plaza or Concourse (Mall).

There is approximately 500 lnft of TSI in the plenum of the Concourse (Mall) ceiling.

Vinyl asbestos floor tiles may however be present in some of the retail stores.

1, 2, 4, and 5 WORLD TRADE CENTER

VINYL ASBESTOS FLOOR TILES

Amount Remaining in 1 WTC:	710,677 sqft
Amount Remaining in 2 WTC:	1,734,032 sqft
Amount Remaining in 4 WTC:	241,000 sqft
Amount Remaining in 5 WTC:	167,515 sqft

These
have not be
May 97.

WTC 4
VAT ABATEMENT STATUS DIAGRAM

4WTC FLOORS	TOTAL VAT Installation area	ABATED Sq Ft VAT IN CLAIM	JOB NUMBERS IN CLAIM	ABATED Sq Ft VAT NOT IN CLAIM	JOB NUMBERS NOT IN CLAIM	REMAINING Sq Ft VAT ON FLOOR	4WTC FLOORS
9	30,000	11,000	116.047			19,000	9
8	60,000					60,000	8
7	60,000	36,600	116.004 / 049 / 065			23,400	7
6	5,000	5,000	116.004 / 005			-	6
5	60,000	40,000	116.066 / 117			20,000	5
4	5,000					5,000	4
3	60,000	4,000	116.057			56,000	3
PLAZA	10,000	200	116.064			9,800	PLAZA
CONCOURSE	30,000					30,000	CONCOURSE
B1 Level	25,000	7,200	116.103 / 106 / 120			17,800	B1 Level
B2 Level	*0*						*B2 Level*
TOTALS	255,000	104,800.00				241,000	TOTALS

WTC 5
VAT ABATEMENT STATUS DIAGRAM

5WTC FLOORS	ABATED Sq Ft VAT IN CLAIM	JOB NUMBERS IN CLAIM	ABATED Sq Ft VAT NOT IN CLAIM	JOB NUMBERS NOT IN CLAIM	REMAINING Sq Ft VAT ON FLOOR	5WTC FLOORS
8	16,222 00	812			17,314 00	8
7					-	7
6					69,359 00	6
5					77,504 00	5
4					-	4
3					-	3
PLAZA					3,338 00	PLAZA
CONCOURSE						CONCOURSE
TOTALS	16,222.00				167,515.00	

WTC 2
VAT ABATEMENT STATUS DIAGRAM

WTC FLOORS	ALT? Sampled	TOTAL VAT (installation area)	ABATED Sq Ft VAT IN CLAIM	CONTRACT NUMBERS	JOB NUMBERS IN CLAIM	ABATED Sq Ft VAT NOT IN CLAIM	JOB NUMBERS NOT IN CLAIM	REMAINING Sq Ft VAT ON FLOOR	WTC FLOORS
110									110
109 MER 108 MER									109 MER 108 MER
107		35,900						1,017	107
106		35,900						34,071	106
105		35,900		115 274	115 283			34,424	105
104		35,900		115 274	115 28?	2,000	9??	34,52?	104
103		35,900		115 274	115 29?			34,473	103
102		35,900		115 274	115 29?	1??		35,46?	102
101	YES	33,46?				33,46?	9??		101
100		-		115 295		2,8??	115 195	-2,8??	100
99		35,900	16,35?	115 29?	1??	1000 3300	874 8??	31,60?	99
98		35,900						35,90?	98
97		35,900	?,000	115 51?	9??	2,000	9??		97
96	YES	35,900	5,000	115 51?	95?	2,100	9??	3,6??	96
95		35,900						35,90?	95
94		35,900						-	94
93		35,900						35,844	93
92	YES	35,846	35,846	115 295	115 152				92
91		35,900						35,742	91
90	YES	35,742	35,742	115 224	115 6464			-	90
89		35,900	35,900	115 295	118 051				89
88		35,900	35,900	115 295	116 0??				88
87		35,900	35,900	115 224 295	115 748 14?				87
86		35,900	35,900	115 295	116 016			-	86
85		35,900						35,901	85
84	YES	35,900	34,414	115 224	75?			1,486	84
83	YES	35,900		115 29?		15,700	3??	19,882	83
82		35,900						33,343	82
81		35,900						33,613	81
80		35,900						32,86?	80
79		35,900						22,82?	79
78	YES	35,90?	11,000 120 000	115 51? 115 295	2?? ?1?			20,895	78
77		35,90?						24,68?	77
76 MER 75 MER		3,00?	2,5??	115 295 802 5?	118 1?2 115 29?			500	76 MER 75 MER
74		34,578				34,57?	23?		74
73		34,578						34,215	73
72		34,578						34,215	72
71		34,578						35,185	71
70		34,578						35,155	70
69		34,578						34,260	69
68		34,578						34,260	68
67		34,578						34,260	67
66		34,578						31,846	66
65		34,578						34,397	65
64		34,578						34,298	64
63		34,578						33,904	63
62		34,578						33,604	62
61		34,578	3,230	115 295	???			27,800	61
60		34,578						34,578	60
59		34,578						33,361	59
58	YES	34,578	33,381	115 510	995			1,197	58
57	YES	34,578	32,56?	115 510	209			2,017	57
56		34,578						33,361	56
55	YES	34,578	14,000	115 224	25?			20,178	55
54		34,578	3,000	115 295	116 02?			31,578	54
53		34,578						33,850	53
52		34,578						33,890	52
51		34,578						33,090	51
50		34,578				4,285	308	19,342	50
49		34,578						33,858	49
48	YES	24,000	24,000	115 510	213			-	48
47	YES	24,000	24,000	115 510	215			-	47
46		34,578						31,091	46
45		34,578						31,852	45
44		34,578						12,848	44
43								-	43
42 MER 41 MER								0 0	42 MER 41 MER
40		32,880	32,880	115 295	118 200			-	40
39		32,880						33,885	39
38	YES	32,880	22,500	115 295	166 168 170 169			10,307	38
37		32,880	32,880	115 300	116 132 141 142 144			-	37
36	YES	32,675	32,675	115 510	115 220			-	36
35	YES	32,880	13,900	115 510	116 215			18,370	35
34		32,880	2,420	115 295	118 042 064 073 086			30,470	34
33	YES	32,880	24,000	115 510 / 115 295	830 875 210 205			8,880	33
32		32,880	32,800	115 295 - 115 300	115 181 116 148			280	32
31	YES	32,880	32,880	115 295	115 179			-	31
30		32,880	850	115 295	116 040			18,180	30
29		32,880						27,?00	29
28		32,880	7,716	115 295	118 024 038 080	3,000	805	25,868	28
27		32,880	15,700	115 295	757 802 106		802 802	14,779	27
26	YES	32,880	32,880	115 295	118 084 - 115 757	1,000		-	26
25		32,880	27,880	115 295	118 068	5,000	857 828	-	25
24	YES	32,880	32,380	115 510	289 863 871	500	322 854	0	24
23	YES	32,880	32,380	115 510	863 871	500	858	0	23
22	YES	32,880	11,876	115 510 115 295	115 848 116	500	864	14,824	22
21	YES	32,880	12,000	115 510	90?			16,835	21
20		32,880						180	20
19		32,880						450	19
18	YES	32,880	17,000	115 51?	981 283 816	350	891	15,275	18
17		32,880						20,870	17
16		32,880						1,882	16
15	YES	32,880	13,900	115 510	348	750	336	17,450	15
14		32,880						4,125	14
13		-						0	13
12		-						0	12
11		-		115 51?		80	216	-80	11
10		-				3,200	217, 218	-3,200	10
9						375	161	-375	9
8 MER 7 MER									8 MER 7 MER
6		1700						1770	6
5		1700						2385	5
4		1700						2001	4
3		1700						2933	3
PLAZA		1700		115 295	115 191	1,400		0	PLAZA
CONCOURSE								0	CON
B1		12000				2,000	349	10000	B1
B2		12000	3,200	115 295	118 107			8800	B2
B3		12000				800	335	11200	B3
B4		12000	6,000	115 296	118 887	800	804	5200	B4
B5								0	B5
B6								0	B6
TOTALS		3,078,432	844,988			118,887		1,736,832	

* Areas not part of license

[illegible] = abated areas

AS OF 8/1/00

Last updated April 20[illegible]

WTC 1
VAT ABATEMENT STATUS DIAGRAM

WTC FLOORS	TOTAL Installation area	ABATED Sq Ft VAT IN CLAIM	JOBNUMBERS IN CLAIM	ABATED Sq Ft VAT NOT IN CLAIM	JOBNUMBERS NOT IN CLAIM	REMAINING Sq Ft VAT ON FLOOR	WTC FLOORS
110							[illegible]
109 MER 108 MER		800.00	118 077				[illegible]
107	35900	35,780.00	115[illegible]	[illegible]	[illegible]		107
106	35800	2,400.00	115 978 / 118 124			13334	[illegible]
105	35900					24334	[illegible]
104	35900	800.00	118 095 122			3105	[illegible]
103	35900					-	103
102	35900	30,000.00	115 742 / 118 092			3035	[illegible]
101	35800	4,000.00	118 082			30081	[illegible]
100	35900	35,800.00	118 014			-	100
99	35800					34081	99
98	35900	35,900.00	118 004			-	98
97	35900					33825	97
96	35800	35,800.00	118 002			35247	96
95	35800					35275	95
94	36215	36,215.00	2[illegible]			-	94
93	35900					-	93
92	36215	36,215.00	21[illegible]			-	92
91	35900	16,480.00	115 992 / 118 111		37[illegible]	19082	91
90	35800	25,800.00	743, 744, 917, 966	7[illegible]	329	4974	90
89	35800	1,200.00	895			21855	89
88	22691	18,301.00	118 072	4500	814	0	88
87	35800	4,500.00	118 068	1000	79[illegible]	20456	87
86	35900					22385	86
85	35800	8,080.00	115 774 118 079 10[illegible]			2848[illegible]	[illegible]
84	35900	10,000.00	83[illegible]			22943	84
83	35900	8,000.00	118 056			1790[illegible]	83
82	35900					30194	82
81	35800	35,800.00	115 214 118 083			-	81
80	35900			2[illegible]	9[illegible]	30195	[illegible]
79	35900	7,000.00	115 822 118 119			27863	[illegible]
78	35900	35,000.00	29[illegible]			-	78
77	35900	16,100.00	844 [illegible]	[illegible]	655	3427	[illegible]
76 MER 75 MER						-	76 MER 75 MER
74							74
73	0						73
72	0			344	963	0	72
71	0			2660	319, 32[illegible]	0	71
70	0					0	70
69	0					0	69
68	0			3100	95[illegible]	0	68
67	0					0	67
66	0					0	66
65	0						65
64	0					0	64
63	0			2000	837	0	63
62	0					0	62
61	0					0	61
60	0			34578	749	0	60
59	0					0	59
58	0					0	58
57	0					0	57
56	0					0	56
55	0					0	55
54	34578	3,500.00	118 049			27421	54
53	34578	2,131.00	118 053			13346	53
52	34578			1000	757	28964	52
51	34578	15,000.00	118 067, 157	250	813	16170	51
50	34578					0	50
49	0					0	49
48	0					0	48
47	0					0	47
46	34578	18,500.00	115 350, 890, 897 / 118 08[illegible]			8897	46
45	34578	20,000.00	926			1[illegible]	45
44	0			8800	323, 851	28964	44
43	0					0	43
42 MER 41 MER						0 0	42 MER 41 MER
40	0					0	40
39	32890					30483	39
38	32890	18,000.00	923, 972			15134	38
37	32875	32,875.00	251, 786			0	37
36	32890			32875	236	0	36
35	32890			32875	235	0	35
34	32890			32875	244	0	34
33	32890	31,490.00	274, 896			0	33
32	32890					0	32
31	32890	31,830.00	266			0	31
30	32890	31,830.00	273			0	30
29	32890	31,830.00	245, 732			0	29
28	32890	31,830.00	265			0	28
27	32890	31,830.00	272			0	27
26	32890	31,290.00	252			0	26
25	32890	31,290.00	271			0	25
24	32890	30,290.00	264	500	958	0	24
23	32890	30,290.00	253	500	958	0	23
22	32890	31,290.00	850, 870			0	22
21	32890			32890	238	0	21
20	32890	31,290.00	259			0	20
19	32890	32,890.00	115			0	19
18	32890	30,872.00	254			0	18
17	32890	30,872.00	268, 849			0	17
16	32890			30872	233	0	16
15	32890	30,872.00	267			0	15
14	32890	30,872.00	260		906	0	14
13	32890	30,872.00	261			0	13
12	32890	30,872.00	250			0	12
11	32890			30872	227	0	11
10	32890			30872	221	0	10
9	32890			30872	242	0	9
8 MER 7 MER							8 MER 7 MER
6	1785			1700	316	85	6
5	2634					2634	5
4	2522					2522	4
3	2800					2800	3
PLAZA	1050					1050	PLAZA
CONCOURSE	11000	10,200.00	118 102			800	CON
B1	8800	3,000.00	118 061			5800	B1
B2	13400	13,400.00	118 040, 050, 133			0	B2
B3	12000	4,470.00	118 013, 880, 887			7530	B3
B4	12000	3,000.00	118 183			9000	B4
B5						0	B5
B6	2000	1,760.00	118 077			250	B6
TOTAL =	2,431,438.00	1,170,816.00		314,845.00		718,877.00	

* Areas not part of Abated VAT [illegible] * Abated Areas

Last updated April 1 200[illegible]

R. W. CRANDLEMERE & ASSOCIATES, INC.
PROTECTING BUSINESS AND THE ENVIRONMENT

November 29, 2000

Merritt & Harris, Inc.
Attn: Mr. Robert G. Weiland, R.A.
110 East 42nd Street
New York, NY 10017

Re: Environmental Site Assessment – World Trade Center
Follow-Up Information Regarding U.S. EPA Listings
Project No. 000095; Merritt & Harris, Inc. #20-251E

Gentlemen:

This letter report presents the results of our Freedom of Information (FOI) requests to the U.S. Environmental Protection Agency (U.S. EPA) Region 2 at 290 Broadway, New York, NY.

This report is intended to supplement our report titled "ASTM E1527-97 Phase I Environmental Site Assessment, One, Two, Four & Five World Trade Center, New York City, NY 10081" dated November 7, 2000. In Section 4.2.1, Federal Regulatory Review, we reported the following:

> A search of the CERCLIS List maintained by the U.S. EPA for locations within a 0.25-mile radius of the Site revealed the following listings:
>
> - 6 World Trade Center Room 114, located in the US Customs Building on the corner of West and Vesey Streets (not specifically included as part of the subject Site, however, the uses of this building are considered as on-Site uses due to the physical presence of the building on the lot that comprises the subject Site.), is listed as:
>
> CERCLIS #NY4470002433, identified as US Customs SCC/Merchandise Control, 6 World Trade Center, Room 114; listed with a Discovery period ending 1/10/89 and a Preliminary assessment period ending 9/27/89. A status of No Further Remedial Action Planned (NFRAP) has been assigned by the EPA for this case.
>
> - 55 Liberty Street, Radium Luminous Materials Co., located approximately 0.14 mile southeast of the subject Site is listed as CERCLIS #NYD987001443 having a State funded Discovery period ending 5/5/92 and an EPA Funded Preliminary Assessment ending 2/11/93 with No Further Remedial Action Planned, assigned status NFRAP.
>
> Under the Freedom of Information Act, a written request was made to review records maintained by the U.S. EPA Region 2 at 290 Broadway, NY, NY. The Freedom of Information (FOI) request was assigned Request Identification Number 02-RIN-02381-00 on September 28, 2000.

On November 21, 2000 a response was received that provided information regarding both CERCLIS NFRA locations (see the attached documents). The documents reviewed indicate:

- U.S. Customs Service, 6 World Trade Center, New York, NY; CERCLIS #NY4470002433 – An extensive review of the operations at the U.S. Customs Service performed by NUS Corporation of Edison, NJ resulted in their September 20, 1989 report (attached). That report indicates that the apparent initiation of the CERCLIS review process was the presence of a pistol firing range and historic storage of unknown and/or potentially hazardous materials related to U.S. Customs seized materials.

  The pistol range, which includes the use of lead bullets, generates approximately 10 pounds of solid waste per year.

  The presence of U.S. Customs seized materials, in addition to unknown materials, included arsenic compounds, acids, dyestuff, paint, degreaser, lubricating oils, motor oils, insecticide, strontium metal, urethane and numerous other materials. Documents indicate that all unknown and/or hazardous materials were removed from the facility in 1987 by a licensed hazardous waste contractor (ENPRO, Inc.). They report that the materials had accumulated over several years. They have modified their procedures to restrict the transport of such materials to their 6 World Trade Center location and entered into a blanket purchase agreement to have hazardous materials removed directly from piers and warehouse areas.

  Based upon the information provided in response to our FOI request, in our opinion, the U.S. Customs operations at 6 World Trade Center should not be a significant threat to the subject Site.

- Radium Luminous Materials Co., 55 Liberty Street, New York, NY; CERCLIS #NYD987001443 – The property was apparently listed for a Preliminary Assessment due to a lack of available background information. The documents reviewed indicate seventeen (17) government agencies were contacted to gather background information. These included the New York State Departments of Environmental Conservation and Health and New York City Bureau of Radiological Control and Department of Environmental Protection. These inquiries yielded no information regarding the location and they state "there is no indication that hazardous substances were ever utilized on-site."

  Additionally, they made a site reconnaissance in 1992 indicated "that there is a low potential for contaminants to leave the site" and that "if any contaminants would be located on-site, they would remain contained inside the building or the building's drain system."

  They concluded that a status of Site Evaluation Accomplished (SEA) be applied to the location and a NFRAP status applies.

  Based upon the NFRAP status, distance, estimated groundwater flow direction, and the dense nature of subsurface structures, in our opinion, it is unlikely this listing indicates a significant

threat to groundwater and/or soil on the subject Site.

A search of the Emergency Response Notification List (ERNS) maintained by the U.S. EPA for the Site only, revealed the Site is listed as:

- 72 S 1 World Trade Center, ID #268421, for a release reported 6/3/92 of an "unknown sheen sighting sheen size 1000 x 400 black and redish".

- World Trade Center, ID #506484, for a reported 9/6/96 of an "unknown sheen sighting, sheen size 200 yds x 400 yds rainbow in color".

A FOI request was made to the U.S. EPA for any available information regarding these ERNS listings on October 4, 2000 and was assigned Request Identification Number 02-RIN-00022-01.

On November 22, 2000, a response was received. The response did not provide any additional information beyond that in the database. The response states the location "is not listed on the CERCLIS or NFRAP lists at the present time."

Based upon the apparent limited nature of the reported sheens, with no transition to the Federal CERCLIS or State Spill or Site listings, in our opinion, these ERNS reports are unlikely to indicate a significant threat to the subject Site.

In conclusion, in our opinion, none of the above discussed CERCLIS or ERNS listings should indicate a significant threat to current on-Site conditions.

Please note, this letter is presented as an addendum to our full Phase I Environmental Site Assessment (ESA) regarding the World Trade Center, New York City, NY. This letter report should only be relied upon in conjunction with our previous ESA report and is subject to all of the limiting conditions and contractual terms and conditions presented in that report as well as to the ASTM E1527-97 Standard.

Yours truly,

R. Wayne Crandlemere
President

Attachments: Response of the U.S. EPA FOI Requests
02-RIN-02381-00 & 02-RIN-00022-01

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 17 2000

Re: Freedom of Information Act Request No.(s): (2)RIN- 0022-01
Subject: WORLD TRADE CENTER, NEW YORK, NY 10007 9/6/96
WORLD TRADE CENTER, NEW YORK, NY 10047 6/3/92

Dear FOIA Requester:

The above-mentioned site is not listed on the CERCLIS or NFRAP lists at the present time.

As of February, 1995, CERCLIS no longer includes sites which EPA has assessed and designated "No further Remedial Action Planned" (NFRAP). A NFRAP designation means, to the best of EPA's knowledge, Superfund has completed it's assessment at a site and determined no further steps would be taken to list this site on the National Priorities List (NPL) unless information is received at a later time indication this decision was not appropriate. A NFRAP decision does not necessarily mean that there is no hazard associated with a given site; it means only that based upon available information, the location is not judged to be a potential NPL site.

Also, the absence of a facility from the CERCLIS list should not be construed as a determination by the EPA that the facility has not been affected by the presence of any hazardous waste. The absence of a facility from this list means that EPA has not received information indicating that there has been a release or threat of release of hazardous substances at or from the facility. Therefore, EPA has not performed an assessment at this location to date. As with any parcel of real property, EPA may be called upon to assess the property for a release or threat of release of hazardous substances should conditions warrant.

In the future, you may conduct site searches by accessing the internet at the following World Wide Web Sites:

CERCLIS: http://www.epa.gov/region02/superfun.htm
ERNS: http://www.epa.gov/ERNS/docs/data.html
NTIS: http://www.ntis.gov
EPA HQ: http://www.epa.gov

You may also obtain hard copy or diskettes of CERCLIS and other Region 2 lists from the Superfund Automated Phone System or from the National Technical Information Service (NTIS) Enclosed are instructions for accessing each of these systems.

If your request includes non-Superfund inquiries, copies of your letter will be sent to other EPA divisions for separate response.

Sincerely,

Leslie H. Peterson, Chief
Resource Management/Cost Recovery Section
Emergency and Remedial Response Division

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 15 2000

Re: Freedom of Information Act Request No.(s): (2)RIN- 2381-00

Dear FOIA Requester:

Enclosed is a copy of the Emergency and Remedial Response Division Archived site file you have requested, EPA ID#S NY4470002433, NYD980700443

As of February 15, 1995, CERCLIS no longer includes sites which EPA has assessed and designated "No Further Remedial Action Planned" (NFRAP). A NFRAP designation means, to the best of EPA's knowledge, Superfund has completed its assessment at a site and determined no further steps would be taken to list this site on the National Priorities List (NPL) unless information is received at a later time indicating this decision was not appropriate. A NFRAP decision does not necessarily mean that there is no hazard associated with a given site; it means only that based upon available information, the location is not judged to be a potential NPL site.

Also, the absence of a facility from the CERCLIS list should not be construed as a determination by the EPA that the facility has not been affected by the presence of any hazardous waste. The absence of a facility from this list means that EPA has not received information indicating that there has been a release or threat of hazardous substances at or from the facility. Therefore, EPA has not performed an assessment at this location to date. As with any parcel of real property, EPA may be called upon to assess the property for a release of hazardous substances should conditions warrant.

In the future, you may conduct searches for Archived sites by accessing the internet at the following World Wide Web Site: http://www.epa.gov/superfund/sites/arcsites/arcstate.htm

Sincerely,

Leslie H. Peterson

Leslie H. Peterson, Chief
Resource Management/Cost Recovery Section
Emergency and Remedial Response Division

Enclosure

0055D
02-8909-09

NUS CORPORATION
NG GEORGES POST ROAD
103
ON, NEW JERSEY 08837
201-225-6160

C-584-09-89-86

September 20, 1989

Ms. Amy Brochu
U.S. Environmental Protection Agency
Region 2
Edison, New Jersey 08817

Re: Letter Report for Merchandise Control Sales Section, U.S. Customs Service, EPA ID No. NY4470002433.

Dear Amy:

After a review of the available background information for the Federal Facilities PA candidate, Merchandise Control Sales Section of the U.S. Customs Service, a recommendation of NO FURTHER REMEDIAL ACTION PLANNED (NFRAP) under CERCLA/SARA is proposed. The Merchandise Control Sales Section is located at 6 World Trade Center in New York City. This PA assignment is authorized under TDD No. 02-8909-09. The recommendation is based upon several findings.

On February 22, 1987, the Merchandise Control Sales Section responded to a request from the U.S. EPA to submit a Potential Hazardous Waste Site Preliminary Assessment form (EPA Form 2070-12). Information was provided about a pistol firing range and included a statement that no hazardous wastes were generated on site that would affect the community or the environment.

On October 9, 1987, a letter from Peter J. Baish, Area Director, N.Y. Seaport, U.S. Customs Service, was sent to Vincent Pitruzzello of the U.S. EPA Region 2, 26 Federal Plaza. This letter stated that the U.S. Customs Service did not want to establish a hazardous waste site at its New York facility, and requested that the EPA amend its records to indicate that this facility was not a hazardous waste site.

On October 30, 1987, a memo was sent by Mr. J. Battaglia of the U.S. Customs Service to Alida Karas of the U.S. EPA at 26 Federal Plaza, listing numerous substances that had been stored on site. It was not clear from the memo whether these were hazardous products or hazardous wastes.

On September 13, 1989, a telephone conversation between Deputy Assistant Director L. Caryn Wise of the U.S. Customs Service, Entry, N.Y. Seaport Area, and NUS Corp. Region 2 FIT, indicated that the facility had stored materials that were confiscated by U.S. Customs Service agents from ships entering New York Harbor. Previously stored materials were removed by a private contractor (Northrup) in 1987. Seized materials are no longer stored at the 6 World Trade Center facility.

On September 14, 1989, a telephone conversation with Mr. Joe Battaglia of the U.S. Customs Service, Sales and Seizure Section, who was formerly employed in the Merchandise Control Sales Section, indicated that no manufacturing or hazardous waste generation ever occurred at the facility and that seized materials were stored for various periods of time before removal by private contractors, which included Applied Technology in New Jersey and ENPRO in Baltimore, Maryland.

C-584-09-89-86

In conclusion, these findings indicate that the Merchandise Control Sales Section of the U.S. Customs Service N.Y. Seaport Area initially filed as a hazardous waste site at the request of the EPA, but the information provided by representatives of the U.S. Customs Service on September 13 and 14, 1989 confirms that the facility does not generate, treat, store, or dispose of hazardous wastes at 7 World Trade Center, New York City, as part of its function for the U.S. government.

Attached are the references to support the NFRAP recommendation. If you have any questions, please do not hesitate to call.

Very truly yours,

Steven Okulewicz

Reviewed and Approved:

SO/ci

Attachment

REFERENCES

1. Potential Hazardous Waste Site, Preliminary Assessment, U.S. Environmental Protection Agency, EPA Form 2070-12; Merchandise Control Sales Section, February 22, 1987.

2. Letter from Peter J. Baish, Area Director, N.Y. Seaport, Department of the Treasury, U.S. Customs, Service to Vincent Pitruzzello, Chief, Program Support Branch, Environmental Protection Agency, Region 2. October 9, 1987.

3. Department of the Treasury, United States Customs Service Memorandum from J. Battaglia to Alida Karas, U.S EPA, 26 Federal Plaza, Subject: General order merchandise of material removed from 6 World Trade Center. October 30, 1987.

4. Telecon Note: Conversation between L. Caryn Wise, Deputy Assistant Director, Entry, N.Y. Seaport Area, U.S. Customs Service, and Steven Okulewicz, NUS Corp., September 13, 1989.

5. Telecon Note: Conversation between Joe Battaglia, Sales and Seizure Section, U.S. Customs Service, and Steven Okulewicz, NUS Corp., September 14, 1989.

United States
Environmental Protection
Agency

Office of Emergency and
Remedial Response
Washington, DC 20460

EPA/540/G-87/010-12
July 1981

EPA

Potential Hazardous Waste Site

Preliminary Assessment

ID NY4470002433

GSA Merchandise Control Sales Sect. 6 World Trade Cent
New York

Attachment #

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
NY	447000245

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Merchandise Control Sales Section	6 World Trade Center

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG. DIST.
New York	NY	10048	New York		

09 COORDINATES LATITUDE	LONGITUDE
40°42.5 min	74° W

10 DIRECTIONS TO SITE (Starting from nearest public road)

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
General Service Admin	26 Federal Plaza

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
New York	NY	10278	(212) 264-8784

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
			( )

13 TYPE OF OWNERSHIP (Check one)

☐ A. PRIVATE ☒ B. FEDERAL: Gen. Serv. Admin (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3001 DATE RECEIVED: 10/23/87 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 3/10/87 (MONTH DAY YEAR)
☒ NO

BY (Check all that apply)

☐ A. EPA ☐ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☒ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): Princeton Testing Lab

02 SITE STATUS (Check one)

☐ A. ACTIVE ☒ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

N/A _____ (BEGINNING YEAR) _____ (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

~~None~~ Lead-firing range

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

No hazard present. Office building. No hazardous waste generated to affect community environment.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH (Protection required prioritized) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on one available basis) ☒ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Michael S. [illegible]	Gen. Serv. Admin	[illegible]

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Michael Parr	Safety/Env	~~Safety/Env~~ Public Building	(212) 264-8787	2/22/[illegible] (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
NJ	44700 02433

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- ☑ A SOLID
- ☐ B POWDER, FINES
- ☐ C SLUDGE
- ☐ D OTHER _____ (Specify)
- ☐ E SLURRY
- ☐ F LIQUID
- ☐ G GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS _____

CUBIC YARDS _____

NO OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- ☒ A TOXIC
- ☐ B CORROSIVE
- ☐ C RADIOACTIVE
- ☐ D PERSISTENT
- ☐ E SOLUBLE
- ☐ F INFECTIOUS
- ☐ G FLAMMABLE
- ☐ H IGNITABLE
- ☐ I HIGHLY VOLATILE
- ☐ J EXPLOSIVE
- ☐ K REACTIVE
- ☐ L INCOMPATIBLE
- ☐ M NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	10 lbs		Lead - Pistol Range

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently used CAS numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS (See Appendix for CAS numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite sources, reference, e.g., state files, sample analysis, reports)

Facility Safety/Health Survey FY'87

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS

01. ☐ A GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ B SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ C CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ D FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ F CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ H WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ I POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES (Spills/runoff, standing liquids, leaking drums) — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

Site is Federal Office building, dealing with day-to-day gov't business. No HW generated to affect community water supply

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA FORM 2070-12 (7-81)

DEPARTMENT OF THE TREASURY
U.S. CUSTOMS SERVICE
NEW YORK, N.Y.

OCT 0 9 1987

REFER TO
FAC ~~1 S:CC~~ JB

Mr. Vincent Pitruzzello
Chief, Program Support Branch
Environmental Protection Agency, Region II
26 Federal Plaza,
New York, N.Y. 10278

Dear Mr. Pitruzzello:

Your office recently forwarded correspondence pertaining to Federal facility pre-remedial activity requirements for the Superfund program. The correspondence comprised a packet of documents and forms requesting detailed information for the establishment of a hazardous waste site.

This office does not wish to establish a hazardous waste site at this facility and we therefore feel that the information requested by your inquiry is unneccessary.

We have in recent months disposed of a quantity of merchandise considered to be hazardous, through the services of a licensed waste-removal contractor (ENPRO Inc.). These items accumulated over several years due to budget restrictions imposed on all Federal agencies. At this point in time we have re-established a blanket purchase agreement to have hazardous materials removed on a continual basis. In addition, we have reinforced regulations to prevent the transferral of such materials from piers and warehouses to this facililty (6 World Trade Center).

In view of the above, it is requested that you amend your records to reflect that this facility is not a hazardous waste site. Accordingly we are returning your documents without any of the requested information.

REPLY TO: AREA DIRECTOR OF CUSTOMS, NEW YORK SEAPORT, NEW YORK, NEW YORK 10048

If further details are required please contact Mr. Michael Contino, Deputy Director, Entry Divison, New York Seaport on (212) 466-5557.

Sincerely,

Peter J. Baish
Area Director
New York Seaport

Enclosure:

REFERENCE NO. 3

DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

TRANSMITTAL AND ROUTING SLIP

SUBJECT OR FILE NO.: Hazardous Waste Removal

SUSPENSE DATE:

ACTION CODES:
1. ACTION 2. APPROVAL 3. AS REQUESTED 4. CIRCULATE 5. COMMENT 6. COORDINATE 7. CORRECT 8. FILE 9. INFORMATION 10. INITIAL ATTACHMENT 11. PER CONVERSATION 12. RETURN 13. SEE ME 14. SEE REMARKS 15. SIGNATURE

TO	DESTINATION	ACTION CODE(S)	INITIALS	OUT DATE	TO	DESTINATION	ACTION CODE(S)	INITIALS	OUT DATE
1	Alicia Kanas				5				
2	U.S.E.P.A.				6				
3	Rm. 747				7				
4	26 Fed. Plaza, N.Y.				8				

REMARKS

re: per phone conversation between Ms. H. Shannon & Mr. Contino, Dep. Dir. Entry Div., attached is listing of materials removed from 6 WTC, N.Y. by the ENPRO Co. in past few months. There are no longer any hazardous wastes stored in this facility.

FROM	OFFICE AND ROOM NO.	PHONE	DATE
J. Pettaglia	Cont. & Compl. 215	466-5557	10/30/87

GPO 519-330

Customs Form 3107 (5-4-77)

604

memorandum

[illegible]ril 18, 1985 merchandise controls sales

FILE: FAC 11-07 NY LAB ES

[illegible]: Director, New York Laboratory

[illegible]: General Order (GO) merchandise; your verbal request for comments on merchandise under custody of Sales and Seizure Section at 6 WTC.

TO: Chief, Merchandise Control Branch

I The following merchandise is hazardous to human and animal health and dangerous to the environment. Items must be disposed by a licensed firm operating in accordance with EPA regulations.

GO No.	Item
3799	"SECOSOL-X ALL 40": Surfactant (IRRITANT); one container/44 lbs.
31337	cyanogen bromide: TOXIC; 5 cans/one pt. each
25166	Arsenic compound: TOXIC; one container/one lb.
70402	degreaser: CORROSIVE; 2 pails/5 gals. each
16139	degreaser: CORROSIVE; 1 pail/5 gals.
70479	degreaser: CORROSIVE; 2 pails/5 gals. each
50873	"TIN GLO CULMO BRIGHTENER": CORROSIVE; 8 pails/5 gals. each
N-1559-E	"GENAPOL 0-100" surfactant: IRRITANT; one can/3 gals.
11729	"ACID CHLORIDE": CORROSIVE; 3 containers
2349	"GRISEOFULVIN USP": antibiotic; one container/236 lbs.
1820	zinc chloride: CORROSIVE; one container/110 lbs.
N-1897-E	isopropyl palmitate: FLAMMABLE; one container/66 lbs.
16571	"AROCHEM 650" plastics material: FLAMMABLE; one container/225 lbs.
64244	PYROLIGNEOUS ACID": TOXIC, FLAMMABLE, and CORROSIVE; one container/50 lbs.
N-1579	"FABEROL 596": oil-FLAMMABLE; one container/136 lbs.
17347	mineral oil: FLAMMABLE; one drum/55 gals.
2305 (a)	"FLORASYNTH 75-R-716" fragrance: FLAMMABLE; one drum/55 gals.
2305 (b)	sodium saccharin: COMBUSTIBLE and CARCINOGENIC; one drum/100 lbs.
28595	"PM 502; PM 503": zinc dust-FLAMMABLE and TOXIC; 2 cans/one quart each
16927	dyestuff: COMBUSTIBLE; one drum/110 lbs.
79027	flavoring: FLAMMABLE; one can/5 gals.
83-76236	paint: FLAMMABLE; one drum/55 gals.
[illegible]247	perfumery essence: FLAMMABLE; one drum/100 lbs.
11205	paint: FLAMMABLE; one drum/55 lbs.

OPTIONAL FORM NO. 10
(REV. 1-80)
GSA FPMR (41 CFR) 101-11.6
5010-114

☆ GPO : 1983 O - 421-526 (9176)

70218	terpineol: FLAMMABLE; 2 drums/55 gals. (935 lbs.) each
70030	lubricating oil: FLAMMABLE and TOXIC; 1 drum/55 gals. (500 lbs.)
3250	motor oil: FLAMMABLE and TOXIC; 1 drum/55 gals. (460 lbs.)
4266	acetal resin: FLAMMABLE and TOXIC decomposition products; 2 containers/55 lbs. each
76-2413	"DIACHLOR B CHELATOR": TOXIC; 2 drums/55 gals. each
45504	sodium dehydroacetate: 1 container/100 lbs.
80-3260	"FURADAN 75": TOXIC; 1 container/55 lbs.
15171	ethyl silicate: FLAMMABLE; 1 container/150 lbs.
17030	"INFIRNOL" surfactant: IRRITANT; 1 container/100 lbs.
6431	dyestuff: COMBUSTIBLE; 1 container/110 lbs.
76702	surfactant: IRRITANT; 1 drum/55 gals. (440 lbs.)
50145	dyestuff: COMBUSTIBLE; 1 drum/275 lbs.
688	lubricating grease: FLAMMABLE and TOXIC; 1 container/50 lbs.
4796	flammable liquids; 5 containers/23 lbs. each
30102	lead stearate + dioctylphthalate: TOXIC and FLAMMABLE; 1 carton/2 lbs.
82-4604	brucine sulfate: TOXIC; 20 cans/100 ozs. each
2912	palm kernel fatty acid: FLAMMABLE and IRRITANT; 1 drum/55 gals.
79017	"SAUEREISEN": soluble silicate, IRRITANT; 2 drums/55 gals. each
1885	acrylic acid: TOXIC; 1 drum/55 gals.
16943	antimony oxide: TOXIC; 1 crate/20 lbs.
55452	cylinder (one gal capacity): isoprene under pressure; FLAMMABLE and EXPLOSIVE
659	ethyl glyoxylate: FLAMMABLE: 10 bottles/1 pint each
23793	insecticide: TOXIC; 1 can/1gal.
23739	polyester resin in styrene: FLAMMABLE and TOXIC; 1 can/5 gals.
N-80-231	"ALBAPLAS": TOXIC; 1 container/10 gals.
N-76-3979	"BERMODAL": FLAMMABLE; 1 container/10 gals.
N-80-3182	"WIN 41361" (dihydrobipyridine carboxamide); TOXIC; 1 drum/25 lbs.
2912	strontium metal: FLAMMABLE and REACTIVE; 1 drum/100 lbs.
45620	sodium lauryl sulfate (EMPICOL LQ 33): IRRITANT; 1 container/55 lbs.

II Merchandise covered under the following G.O. Nos. was found t be non-hazardous to health and environment and was discarded into commercial trash dumpsters.

G.O. No.	G.O. No.
82-23742	3077
823	2239
563	22418
15305	28915
31107	842
14426	18777
1035	64244
972	5783
26958	

Amelia Eaton

cc: Head, Sales & Seizure Section

Location

SALES & SEIZURE SECTION, ROOM 114

(RADIOACTIVE MATERIALS)

LOT #	G.O. #	DESCRIPTION
12/81-325	28579	(1) BLUE METAL DRUM, 22" H. X 14½, 301 LBS.
2/82-57	0073	(4) GREEN METAL CANNIATERS, 21½" H. X 4½" D. 9 OBS. EACH
2/82-454	32008	(2) SUITCASE TYPE PACKAGES CONTAINING X-RAY EQUIP. 7" X 12" X 24" - 39 LBS. 9½"X 10" X 18½" 34 LBS.
9/82-235	12556	(2) CT. OF "MACHINE SPARE PARTS BOTH 12½"X 12½" X 13½" - 13½ LBS. EACH.
5/81-1625-B	N-1636-E	(1) CR. CONTAINING A LARGE METAL FIXTURE 3'X4'X8' 893 LBS., and (1) GRAY METAL BOX LABELED "NUCLEAR ENTERPRISES LTD." 8"X15½"X20" - 61 LBS.
2/83-130	82-4136	(2) CT. OF "EXEMP RADAR. BOTH 12½ X 12 3/4" X 13" 14 LBS. EA.
2/83-160	23212	(1) CT. CONTAINING A "LAB SAMPLE OF LEDAKRIN - C-14 RADIOACTIVITY OF 1 X .2.0 mCi 5½" X 4½" X 4" 1 LB.
10/83-166	82-27253	(2) RADIOACTIVE FOUNTAIN
10/83-642	83-28583	(1) RADAR ACTIVE MATERIAL

LOCATION

SALES & SEIZURE SECTION, ROOM 114

(CHEMICALS)

LOT #	G.O. #	DESCRIPTION
9/86-332	9635	1 SMALL PLASTIC BAG OF YELLOW COLORED POWDER 1 LARGE PLASTIC BAG OF ORANGE COLORED POWDER
11/86-183	10400	2 PLASTIC BOTTLES OF FUEL OIL SAMPLES
9/86-381	41208	40 13oz. CANS OF PLASTIC SPRAY
5/85-431	46931	4 SMALL CANS OF LIQUID SUBSTANCE-POSSIBLY PAINT
11/86-494	11449	12 825ml. CANS OF INSTANT p.u. FOAM
11/86-475	11347	5 SMALL GLASS AMPULES OF PESTICIDES
3/86-718	45535	1 SMALL CAN OF UCECOAT UM 23 1 LARGE CAN OF UCECOAT NPU 23
8/86-355	8084	2 GLASS BOTTLES OF XEROX FUSER LUBE
3/86-697	45658	1 CAN (200g) OF TRIGANOX
6/86-249	5520	1 PLASTIC BAG OF HARD YELLOW SUBSTANCE
8/86-207	9108	1 PLASTIC BOTTLE OF FUEL OIL SAMPLE
1/86-159	00310	1 PLASTIC BOTTLE OF EPOXY HARDNER
9/86-[illegible]	9032	1 BAGOF BROWN COLORED POWDER
11/86-394	10916	1 BAG OF BLUE COLORED POWDER
9/86-320	9599	4 250 ml CANS MARKED: ECP 521 GRAPHITE COATING ECP 502, ECP 503, ECP 531 - UNKNOWN
5/86-274	4211	2 1 kg. BAGS MARKED: 245 RESIN & 345 RESIN
9/86-306	9493	1 SMALL CAN OF PAINT
1/86-594	3244	1 SMALL CAN OF PAINT
5/86-423	4618	1 GLASS BOTTLE OF BENZALDEHYDE
8/85-15	15967	6 PLASTIC BOTTLES OF LUBE OIL SAMPLES
9/86-329	9619	5 CANS OF DIVINYL BENZENE
12/85-264	21664	1 BAG OF WHITE GRANULAR SUBSTANCE

LOCATION
SALES & SEIZURE SECTION, ROOM 114

(CHEMICALS)

LOT #	G.O. #	DESCRIPTION
10/85-621	50273	3 CANS EACH CONTAINING 1000 TABLETS OF MERCURYOXIDE AND POTASSIUM SULPHATE COMBINATION
3/86-352	2360	1 CAN OF OIL
1/86-226	00573	1 PKG. OF BARIUM COMPOUND
5/85-884	47667	2 METAL CONTAINERS OF PERFUME
12/85-346	47356	1 2.5 gal. PLASTIC CONTAINER OF PRE-MIX TONER
3/86-505	2904	2 CANS OF URETHANE
8/85-260	16738	2 LARGE GLASS BOTTLES MARKED: No. 1 ZAYIF BHC No. 2 LIN DAME
5/86-411	4600	2 CANS - POSSIBLY PETROLIUM PRODUCT
7/86-261	6812	9 METAL BOTTLES MARKED: ACIDE CEKANOIC (C8-C10)
2/85-1	2340	2 CANS OF LIQUID SUBSTANCE
3/85-384	45756	4 PLASTIC CONTAINERS OF HI-SPEED CONCENTRATE 1 PLASTIC CONTAINER OF ACTIVATOR
5/85-398	46737	1 20 LITER CAN OF GENERAL DEGREASER
5/84-243	12069	2 PLASTIC BAGS OF DEXAMETHASONE BASE
2/85-44	70352	1 BURLAP BAG OF BLACK POWDER
3/85-494	45655	1 55 GAL. DRUM OF LIQUID SUBSTANCE
3/86-708	45522	11 PLASTIC DRUMS OF OIL
12/85-360	47381	7 20 LITER PLASTIC CONTAINERS OF NICORON
5/85-840	46371	6 CANS OF PAINT
'86-201	1905	2 GLASS BOTTLES OF OIL SAMPLES

NUS CORPORATION AND SUBSIDIARIES — **TELECON NOTE**

CONTROL NO:	DATE:	TIME:
02-5909-09	9/13/89	1600

DISTRIBUTION:

TO FILE: MERCHANDISE CONTROL SALES SECTION

BETWEEN:	OF:	PHONE:
DEPUTY ASST. DIRECTOR L. CARYN WISE	ENTRY, N.Y. SEAPORT AREA, U.S. CUSTOMS SERVICE	212 466-5557

AND:

STEVEN OKULEWICZ, NUS EDISON

DISCUSSION:

I ASKED MS. WISE ABOUT THE HAZARDOUS MERCHANDISE THAT WAS STORED AT THE N.Y. FACILITY AT 6 WORLD TRADE CENTER. SHE INFORMED ME THAT THE MATERIAL STORED THERE AT THAT TIME WERE IMPORTED PRODUCTS, MERCHANDISE, AND ITEMS SEIZED BY U.S. CUSTOMS AGENTS FROM SHIPS ENTERING N.Y. PORTS. SEIZED MATERIALS ARE NO LONGER STORED THERE AND ARE CURRENTLY REMOVED BY A PRIVATE CONTRACTOR CALLED "NORTHROP" I ASKED ABOUT THE EXISTANCE OF A FIRING RANGE ON SITE AND WAS TOLD THAT IT IS EXTANT. MS. WISE GAVE ME THE NAME AND PHONE NUMBER OF AN EMPLOYEE WHO WORKED IN THIS AREA OF STORAGE — JOE BATTAGLIA - 212 466 5567. I WILL CALL HIM

ACTION ITEMS:

FOR FURTHER INFORMATION

NUS 067 REVISED 0685

NUS CORPORATION AND SUBSIDIARIES — **TELECON NOTE**

ITROL NO:	DATE:	TIME:
02-3909-09	9/14/89	1715

DISTRIBUTION:

TO FILE: MERCHANDISE CONTROL SALES SECTION

BETWEEN:	OF:	PHONE:
JOE BATTAGLIA	SALES AND SEIZURE SECTION U.S. CUSTOMS SERVICE	(212) 466-5557

AND:

STEVEN OKULEWICZ, NUS EDISON

DISCUSSION:

I ASKED MR. BATTAGLIA ABOUT THE HAZARDOUS WASTES THAT WERE STORED AT THE WORLD TRADE CENTER FACILITY. HE SAID THAT ALL OF THE STORED MATERIALS AND ITEMS WERE SEIZED BY U.S. CUSTOMS OFFICERS FOR VARIOUS REASONS, FROM SHIPS ENTERING NEW YORK HARBOR. NO MANUFACTURING OR WASTE GENERATION EVER OCCURRED AT THE FACILITY. THE WASTES WERE STORED FOR VARIOUS PERIODS OF TIME. THEY WERE EVENTUALLY REMOVED BY VARIOUS COMPANIES — APPLIED TECHNOLOGY IN NEW JERSEY AND ENRO IN BALTIMORE MARYLAND. I ASKED HIM ABOUT THE DISPOSITION OF THE RADIOACTIVE MATERIAL LISTED ON THE 1985 INVENTORY. HE SAID IT WAS REMOVED BY EPRI. THE RADIOACTIVE MATERIAL WAS LOW GRADE

ACTION ITEMS:

AM IN AS MUCH QUANTITY, PROBABLY ASSOCIATED WITH A CESIUM X-RAY MACHINE.

MAR 08 1990

Mr. William Prazak, Director
Real Property Management and
Safety Division
General Services Administration, Region 2
Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

Re: U.S. Information Agency, Brooklyn, NY
Federal Building, Varick St., New York, NY
Federal Building, 7th Ave., New York, NY
Merchandise Control Sales, New York, NY
Emmanuel Cellard Federal Bldg., Brooklyn, NY
GSA Raritan Depot, Edison, N.J.

Dear Mr. Prazak:

This is in reference to your letter of December 21, 1989 pertaining to the above referenced facilities listed on the United States Environmental Protection Agency's (EPA) Region 2 Federal Agency Hazardous Waste Compliance Docket ("docket").

Upon review of the Preliminary Assessments (PA) which your agency submitted for the subject facilities, with the exception of GSA Raritan Depot, we have determined that no further remedial action is required for these facilities at this time. However, this determination is subject to change in the future if additional information becomes available to EPA which warrants a re-evaluation of the facilities.

With regard to GSA Raritan Depot, we are still awaiting PA information from GSA as per the attached February 9, 1990 letter from William Jenkins, GSA Assistant Regional Administrator - Public Buildings Service. Please note that GSA currently still owns property at Raritan Depot and hence, is required to submit a PA. Upon receipt of the PA, EPA will review it to determine any future action at the site.

If you have any questions, please call Helen Shannon at (212) 264-6664 of my staff.

Sincerely yours,

Robert J. Wing, Chief
Federal Facilities Section

Attachment

cc: S. Shubert, GSA

bcc: V. Pitruzzello, PSB
H. Shannon, FFS

SUPERFUND DATE: 05/05/92

NEW SITE ASSIGNMENT FORM

CERCLIS EPA I.D. NUMBER _____

NAME OF FACILITY RADIUM LUMINOUS MATERIALS CO. (40)

STREET 55 LIBERTY STREET (30)

CITY NEW YORK, NY ZIP CODE 10005 (10)

COUNTY MANHATTAN (25) COUNTY CODE ___ (3)

SOURCE __ (1) CONG DIST __ (2)

LATITUDE: __ __ / __ __ / __ __ . __ LONGITUDE __ __ __ / __ __ / __ __ . __

LL SOURCE: __ (1) LL-ACCURACY: __ (1)

INVENTORY IND: Y REMEDIAL IND: __ REMOVAL IND: __ FED FAC IND: __

NPL IND: __ NPL LISTING DATE: __ __ / __ __ NPL DELISTING DATE: __ __ / __ __

NO FURTHER ACTION: ___

SITE DESCRIPTION: _____

*NOTE: PLEASE KEEP SITE DESCRIPTIONS DOWN TO 30 WORDS OR LESS. (240 CHARACTERS)

OPERABLE UNIT ID: 0 0 EVENT LEAD: __ (1)

ACTUAL COMPLETION DATE: 05/05/92 EVENT TYPE: D S 1 (3)

ACTUAL START DATE: __ __ / __ __ / __ __ EVENT TYPE: ___ (3)

ACTUAL COMPLETION DATE: __ __ / __ __ / __ __

ACTUAL START DATE: __ __ / __ __ / __ __ EVENT TYPE : ___ (3)

ACTUAL COMPLETION DATE __ __ / __ __ / __ __

Page 1

Report No.: 8003-104
Work Assignment No.: 019-2JZZ
Contract No.: 68-W9-0051
November 30, 1992
Updated: February 9, 1993

Ms. Sandra Foose
Pre - Remedial Assistant WAM
Environmental Services Division
U.S. Environmental Protection Agency
Region II
Edison, NJ 08837

AGB
2/11/93
SEA

RE: Radium Luminous Materials Preliminary Assessment

Dear Ms. Foose:

After review of the available information for the Preliminary Assessment (PA) of Radium Luminous Materials, a recommendation of SITE EVALUATION ACCOMPLISHED (SEA) is proposed. Radium Luminous Materials (EPA ID No. NYD987001443) was formerly located at 55 Liberty Street, Manhattan, New York County, New York. The recommendation of a SEA is based on the following findings:

- No background information was initially available for this site. A search was conducted with various city, state, and federal agencies in order to locate any information available for this site. Specifically, information regarding the type of work formerly conducted on-site, and the types of materials formerly utilized in on-site processes was requested. Seventeen agencies were contacted for information including the following: the New York State Department of Environmental Conservation (NYSDEC), the New York State Department of Health (NYSDOH), the New York City Department of Environmental Protection (NYCDEP), the U.S. Environmental Protection Agency (USEPA), the New York City Bureau of Radiological Control (NYCBRC), and the New York State Department of Labor (NYSDOL). No information was available from any of the abovementioned agencies. Therefore, there is no indication that hazardous substances were ever utilized on-site.

- A reconnaissance performed for this site in 1992 indicated that there is a low potential for contaminants to leave the site. The site is a 25-story high rise, steel-framed, concrete building. Therefore, if any contaminants would be located on-site, they would remain contained inside the building or the building's drain system.

The lack of a documentable waste source, lack of a documented release to the environment, and the lack of migration pathways led to the above recommendation.

Attached are the references to support the recommendation. If you have any questions, please do not hesitate to call.

Very truly yours,

LISA SZEGEDI
SITE MANAGER

JOHN D. RIECKHOFF
PRE-REMEDIAL PROGRAM MANAGER

DENNIS STAINKEN, Ph.D.
WORK ASSIGNMENT MANAGER

j:\8003104\scnltr

REFERENCES

1. U.S. Environmental Protection Agency (EPA) Superfund Program, Comprehensive Environmental Response Compensation Liability Information System (CERCLIS) List-8: Site/Event Listing, p. 459, August 31, 1992.

2. Project Note: From Lisa Szegedi, Malcolm Pirnie, Inc., to Radium Luminous Materials file; Subject: Agencies contacted during background information search, November 16, 1992.

3. Field Notebook No. 8003-1-04-102, Radium Luminous Materials, Off-site Reconnaissance, Malcolm Pirnie, Inc., October 28, 1992.

VM DATE: 08/31/92 16:15:56
ERCLIS DATA BASE DATE: 08/28/92
ERCLIS DATA BASE TIME: 16:20:15
ERSION 3.00

** PROD_VE.. **
U.S. EPA SUPERFUN_ PROGRAM
** C E R C L I S **
LIST-01 SITE/EVENT LISTING

CERHELP DATA BASE DATE: /A
CERHELP DATA BASE TIME: /A
***** FOR INTERNAL USE ONLY *****

ELECTION:
EQUENCE: REGION, STATE, SITE NAME

VENTS: ALL

EPA ID NO.	SITE NAME / STREET / CITY / COUNTY CODE AND NAME	STATE	ZIP / CONG DIST.	UPRBLE UNIT	EVENT TYPE	EVENT QUAL	ACTUAL STAR DATE	ACTUAL COMPL DATE	CURRENT EVENT LEAD
NYD001667872 (CONTINUED)	RADIUM CHEMICAL			(01)	CU1		10/18/89	06/21/90	OTHER
					RU1			06/21/90	EPA (FUND)
					RA1		06/29/90		EPA (FUND)
					TA1		07/12/90		EPA (FUND)
					TA2		09/28/90		EPA (FUND)
NYD987001443	RADIUM LUMINOUS MATERIALS CO			00	OS1			05/05/92	STATE(FUND)
OT #6	55 LIBERTY STREET								
ck #64	NEW YORK	NY	10005						
	061 NEW YORK		NY-17						
NYD981560881	RAILROAD CAR SHOPS			00	OS1			09/19/86	STATE(FUND)
	DESPATCH DRIVE				PA1		09/19/86	09/29/86	STATE(FUND)
	EAST ROCHESTER	NY	14445		SI1		06/01/90	02/13/91	STATE(FUND)
	055 MONROE		NY-30						
NYD980507545	RAMAPO INCINERATOR			00	OS1			05/01/80	EPA (FUND)
	RTE 45 & INCIN R				PA1			03/05/87	STATE(FUND)
	RAMAPO	NY	10931		SI1		06/15/87	06/23/87	EPA (FUND)
	087 ROCKLAND		NY-26		SI2		01/01/91	06/24/91	STATE(FUND)
NYD000511493	RAMAPO LF			00	RS1		04/16/90	09/07/90	EPA (FUND)
	RTE 59				RS2		11/08/91	01/31/92	EPA (FUND)
	RAMAPO	NY	10931		OS1			05/01/79	EPA (FUND)
	087 ROCKLAND		NY-22		PA1			05/01/83	EPA (FUND)
					HR1			12/01/82	EPA (FUND)
					NP1			12/30/82	EPA (FUND)
					NF1			09/08/83	EPA (FUND)
					SI1		05/01/83	05/01/83	EPA (FUND)
					SI2		05/01/83	05/01/83	STATE(FUND)
				01	CK1		04/11/88		OTHER
					CO1		04/11/88	03/31/92	OTHER
					RU1			03/31/92	FED ENFURCE

8003-104-101

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PROJECT NOTES

	Date: November 16, 1992
	Project #: 8003-104
	Site Name: Radium Luminous Materials

d in order to locate background information for the site. No background
e agencies:

Dr. Paul Merges (518)-457-2225
perator (212)-502-0700
-5422
ford (718)-482-4995
area-operator (718)-482-4851
perator (212)-613-4200
n Bates (518)-458-6400
eld engineer (718)-643-7875
-9811
-4670
gement-operator (518)-457-6934
nagement (518)-457-6934
emediation-operator (518)-457-5861
us site control-John Swarwout (518)-457-8807
3)-797-7641
gela Short (212)-264-9581
-Dr. I wski (718)-643-7967

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N/AGREEMENT

3:00 [ ] AM [X] PM

Telephone No.

518-457-2225

Telephone No.

Radiation and Hazardous Substances

4-641-2681

Telephone No.

secretary who
office. It was
on Friday, 10/9/92.

1 of 21

ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/9/92 Time: 11:15 [X] AM [ ] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: Dr Paul Merges 518-457-2225
Telephone No.
Affiliation: NYSOEC, Bureau of Radiation & Hazardous Subst.

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x261
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Dr. Merges out again according to secretary, and will not be in again until Tuesday 10/13/92. I left message identifying project and asking him to return call to me.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-104-101 (997 906)

Date: 10/13/92 Time: 9:12 [X] AM [ ] PM

[ ] Incoming Call From: _____ Telephone No.

Affiliation: _____

[X] Outgoing Call To: Dr. Paul Merges DEC 518-457-2225 Telephone No.

Affiliation: NYSDEC, Bureau Radiation, Hazardous Substance.

Malcolm Pirnie Staff: Alfred Carlucci 201-529-4700 x361
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Called Dr. Merges per his office's instruction on 10/9/92. He was in conference and will return call.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097, 100, 104-101

Date: 10/13/92 Time: 9:25 [X] AM [ ] PM

[ ] Incoming Call From: ______ Telephone No.

Affiliation: ______

[X] Outgoing Call To: Dr. Paul Merges 518-457-2225 Telephone No.

Affiliation: NYSDEC, Bureau of Radiation, Hazardous Substances

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x 261
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Telephoned Dr. Merges a second time + reached him.

Dr. Merges acknowledged that his unit was familiar with several of our sites. He transferred me to his staff person John Abunaw (Aboro).

The above three projects, as well as Ossining Historical Society and Photo Chemical Products (8003-101 and 8003-103 resp.) were conveyed to Mr. Abunaw. He was immediately familiar with the names of three of the above: International Dial Co., Radium Luminous Materials and Photo Chemical Products. He indicated that he would check the files for these 5 sites to pull information and would call me back by Next Monday. He expressed concern + urgency.

Regarding these sites, and others, Mr. Abunaw offered that many sites they have listed are taken from a variety of sources such as business directories and some may be Corporate HQ or offices, not necessarily contaminated sites, or may have been known to have at one time stored radioactive materials.

Mr. Abunaw was asked if he could locate any additional contacts during his file search who could provide additional information and to provide them when we speak again.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097400/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: NYS DOH, NYC Admin. Area. 212-502-0700
Telephone No.
Affiliation: _____

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x361
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Operator referred me to 212-613-4300, a division dealing with Hazardous waste/Health. Had no information.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: DOH Division Assistant 518-474-5432
Telephone No.
Affiliation: NYS DOH.

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x261
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

No information was available, I was referred to DoH, Steve Bates at 518-458-6400.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/13/92 Time: 10:45 [X] AM [ ] PM

[X] Incoming Call From: Nigel Crawford 718-482-4595
Telephone No.
Affiliation: NYS DEC Region II

[ ] Outgoing Call To: _____
Telephone No.
Affiliation: _____

Malcolm Pirnie Staff: Alfred Gallin 201-529-4300 x241
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Mr. Crawford returned my call to his office Friday 10/9/92. He indicated that his office did not handle radioactive wastes but that Dr. Menges office in Albany did. He went on to confirm that all radioactive files should be found in Dr. Menges office which is NYS DEC, Bureau of Radiation, Hazardous Substances at 518-457-2225.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: NYS DEC Region II 718-482-4851
Telephone No.
Affiliation: _____

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x261
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Seeking information on the 3 referenced projects in preparation of performing PAs.

I spoke to operator/secretary who referred me to Gopi Nathan at 718-482-4995.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: NY Hazardous Waste 212-613-4500
Telephone No.
Affiliation: NYS DOH

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x261
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Office had no information. Referred me to Albany DOH. at 518-474-5422.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: Mr. Steve Bates 518-458-6408
Telephone No.
Affiliation: NYS DOH - Albany

Malcolm Pirnie Staff: Alfred Candela 201-529-4700 x 761
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Telephoned for Mr. Bates but found he was not available. Requested information regarding these three projects of his secretary. She stated that he would call me back.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/6/92 Time: sc 3:00 [ ] AM [X] PM

[X] Incoming Call From: Steven Bates 518-458-6400
Telephone No.
Affiliation: NYS DOH - Albany

[ ] Outgoing Call To:
Telephone No.
Affiliation:

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x 261
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Mr. Bates returned my telephone request for information. He offered that he had no record of these three project sites and therefore could not assist further. ~~He offered no new contacts.~~ He suggested contacting Ezra Aviles at the NYSDEC Region II ~~518~~ 718-482-4995 (Same office as Gopi Nathan)

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: NYC DOH - Radiation Control 718-643-7875
Telephone No.
Affiliation: _____

Malcolm Pirnie Staff: Alfred Conklin 201-529-4700 x361
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Spoke with a "field engineer" who indicated that he/they had no record/files for these three projects.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 800 3-097/100/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: NYCDEP 718-699-9811
Telephone No.
Affiliation: _____

Malcolm Pirnie Staff: Alfred Conklin 201-529-4300 x361
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

This office had no knowledge of these projects + referred caller to 718-595-4650.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/6/92 Time: _____ [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: NYCDEP 718-595-4676
Telephone No.
Affiliation: _____

Malcolm Pirnie Staff: Alfred Coulin 201-529-4700 x361
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

I was referred to Mr. Sergio Matos, NYCDEP, at 718-595-4645.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/7/92 Time: ~2:00 [ ] AM [X] PM

[ ] Incoming Call From: _____ Telephone No.

Affiliation: _____

[X] Outgoing Call To: Dept. Waste Management 518-457-6934 Telephone No.

Affiliation: NYSDEC Albany

Malcolm Pirnie Staff: Telford Conklin 914-641-2681 201-529-4200 x: Telephone No.
(Receiving or Calling) Name

Summary of [X] Conversation [ ] Agreement:

Was referred to Hazardous Waste Remediation unit at 518-457-5861.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/7/92 Time: ≈2:00 [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: Hazardous Waste Remediation 518-457-5861
Telephone No.
Affiliation: NYS DEC Albany

Malcolm Pirnie Staff: Alfred Carlin 914-641-7681
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

Mr. Carlin referred to Bureau Chief John Swartwout of Bureau of Hazardous Site Control at 518-457-5807.

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-097/100/104-101

Date: 10/7/92 Time: ~1200 [ ] AM [X] PM

[ ] Incoming Call From: _____
Telephone No.
Affiliation: _____

[X] Outgoing Call To: John Swanwout 518-457-8807
Telephone No.
Affiliation: NYSDEC (Albany), Bureau of Hazardous Site Control

Malcolm Pirnie Staff: Alfred Coulkin 914-681-7681
(Receiving or Calling) Name Telephone No.

Summary of [X] Conversation [ ] Agreement:

I was referred to Dr. Paul Merges, NYSDEC Bureau of Radiation and Hazardous Substances at 518-457-2225.

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STATE OF NEW YORK
DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
ONE MAIN ST.
BROOKLYN, NY 11201

RADIOLOGICAL HEALTH UNIT

October 23, 1992

Ms. Lisa Szegedi
Malcolm Pirnie, Inc.
104 Interchange Plaza
Cranbury, New Jersey 08512-9543

Dear Ms. Szegedi:

I have enclosed information from our files on the following former radium companies as you requested under the Freedom of Information Act:

1. International Dial Co., Inc.
   22 West 19th Street
   New York, New York 10011 — 22 pages

2. Canadian Radium and Uranium Corporation
   a.k.a. Canrad - Hanovia, Inc.
   43 West 16th Street
   New York, New York — 11 pages

3. Photo Chemical Products, Inc.
   22-78 35th Street
   Long Island City, NY 11105 — 25 pages

4. United States Radium Corporation
   55 Liberty Street
   New York, New York — 0 pages

Nothing could be found for U.S. Radium at 55 Liberty Street. Most of our file concerns 535 Pearl Street which was demolished in the 1960's to make way for 26 Federal Plaza. If you have any further questions please contact me at (718) 797-7637.

Very truly yours,

Rose Marie Pratt

Rose Marie Pratt
Associate Radiophysicist

RMP/wp

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-102

Date: October 14, 1992 Time: 9:28 AM [] PM []

Outgoing Call

To: Angela Short (212)-264-9581 Telephone No.

Affiliation: USEPA, radiation branch

Malcolm Pirnie Staff: Lisa Szegedi (609) 860-0100 Telephone No.

Summary of Conversation:

Ms. Short informed me that a search for files on these radiation sites has already been completed. Places contacted include the NYSDEC and Argonne National Labs. She suggested several other places for us to check. These include the following: 1) Thomas' Register-she said this can be found in many libraries 2) The New York City Dept. of Industrial Adult Hygiene-she said this group may not exist on its own anymore, but may have been incorporated into another group 3) The New York City Buildings Dept.-this group contains a database which lists all buildings in the city, and any inspection etc. which has occurred there 4) The Public Health Service, center for human radiobiology 5)John Higgins, removal action branch of the EPA Edison-he did work on the Ossining Historical Society 6) The Sanborn Map Company

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ARCS II CONTRACT 68-W9-0051
MALCOLM PIRNIE, INC.
RECORD OF TELEPHONE CONVERSATION/AGREEMENT

File No. 8003-100

Date: November 9, 1992 Time: 1:45 AM ☐ PM ☐

Outgoing Call

To: name unknown (718)-643-7967 Telephone No.

Affiliation: NYCBRC

Malcolm Pirnie Staff: Lisa Szegedi (609) 860-0100 Telephone No.

Summary of Conversation:

I called to find out if they had any information on the request letter I sent in. I was told that Dr. Kulikowski has been busy, and I should call again next week.

Note: I was unable to obtain any information from this agency.

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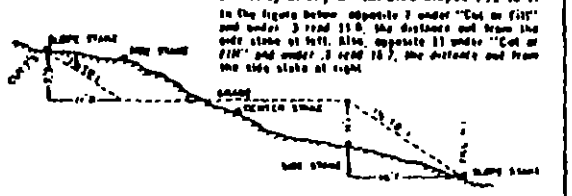
REFERENCE NO. 3

DISTANCES FROM SIDE STAKES FOR CROSS-SECTIONING

Roadway of any Width. Side Slopes 1½ to 1.

In the figure below, opposite 7 under "Cut or Fill" and under .3 read 11.8, the distance out from the side stake at left. Also, opposite 11 under "Cut or Fill" and under .3 read 10.7, the distance out from the side stake at right.



Cut or Fill	0	.1	.2	.3	.4	.5	.6	.7	.8	.9	Cut or Fill
	Distance out from Side or Shoulder Stake										
0	0.0	0.2	0.3	0.5	0.6	0.8	0.9	1.1	1.2	1.4	0
1	1.5	1.7	1.8	2.0	2.1	2.3	2.4	2.6	2.7	2.9	1
2	3.0	3.2	3.3	3.5	3.6	3.8	3.9	4.1	4.2	4.4	2
3	4.5	4.7	4.8	5.0	5.1	5.3	5.4	5.6	5.7	5.9	3
4	6.0	6.2	6.3	6.5	6.6	6.8	6.9	7.1	7.2	7.4	4
5	7.5	7.7	7.8	8.0	8.1	8.3	8.4	8.6	8.7	8.9	5
6	9.0	9.2	9.3	9.5	9.6	9.8	9.9	10.1	10.2	10.4	6
7	10.5	10.7	10.8	11.0	11.1	11.3	11.4	11.6	11.7	11.9	7
8	12.0	12.2	12.3	12.5	12.6	12.8	12.9	13.1	13.2	13.4	8
9	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	14.9	9
10	15.0	15.2	15.3	15.5	15.6	15.8	15.9	16.1	16.2	16.4	10
11	16.5	16.7	16.8	17.0	17.1	17.3	17.4	17.6	17.7	17.9	11
12	18.0	18.2	18.3	18.5	18.6	18.8	18.9	19.1	19.2	19.4	12
13	19.5	19.7	19.8	20.0	20.1	20.3	20.4	20.6	20.7	20.9	13
14	21.0	21.2	21.3	21.5	21.6	21.8	21.9	22.1	22.2	22.4	14
15	22.5	22.7	22.8	23.0	23.1	23.3	23.4	23.6	23.7	23.9	15
16	24.0	24.2	24.3	24.5	24.6	24.8	24.9	25.1	25.2	25.4	16
17	25.5	25.7	25.8	26.0	26.1	26.3	26.4	26.6	26.7	26.9	17
18	27.0	27.2	27.3	27.5	27.6	27.8	27.9	28.1	28.2	28.4	18
19	28.5	28.7	28.8	29.0	29.1	29.3	29.4	29.6	29.7	29.9	19
20	30.0	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.2	31.4	20
21	31.5	31.7	31.8	32.0	32.1	32.3	32.4	32.6	32.7	32.9	21
22	33.0	33.2	33.3	33.5	33.6	33.8	33.9	34.1	34.2	34.4	22
23	34.5	34.7	34.8	35.0	35.1	35.3	35.4	35.6	35.7	35.9	23
24	36.0	36.2	36.3	36.5	36.6	36.8	36.9	37.1	37.2	37.4	24
25	37.5	37.7	37.8	38.0	38.1	38.3	38.4	38.6	38.7	38.9	25
26	39.0	39.2	39.3	39.5	39.6	39.8	39.9	40.1	40.2	40.4	26
27	40.5	40.7	40.8	41.0	41.1	41.3	41.4	41.6	41.7	41.9	27
28	42.0	42.2	42.3	42.5	42.6	42.8	42.9	43.1	43.2	43.4	28
29	43.5	43.7	43.8	44.0	44.1	44.3	44.4	44.6	44.7	44.9	29
30	45.0	45.2	45.3	45.5	45.6	45.8	45.9	46.1	46.2	46.4	30
31	46.5	46.7	46.8	47.0	47.1	47.3	47.4	47.6	47.7	47.9	31
32	48.0	48.2	48.3	48.5	48.6	48.8	48.9	49.1	49.2	49.4	32
33	49.5	49.7	49.8	50.0	50.1	50.3	50.4	50.6	50.7	50.9	33
34	51.0	51.2	51.3	51.5	51.6	51.8	51.9	52.1	52.2	52.4	34
35	52.5	52.7	52.8	53.0	53.1	53.3	53.4	53.6	53.7	53.9	35
36	54.0	54.2	54.3	54.5	54.6	54.8	54.9	55.1	55.2	55.4	36
37	55.5	55.7	55.8	56.0	56.1	56.3	56.4	56.6	56.7	56.9	37
38	57.0	57.2	57.3	57.5	57.6	57.8	57.9	58.1	58.2	58.4	38
39	58.5	58.7	58.8	59.0	59.1	59.3	59.4	59.6	59.7	59.9	39
40	60.0	60.2	60.3	60.5	60.6	60.8	60.9	61.1	61.2	61.4	40

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2	SITE SKETCH
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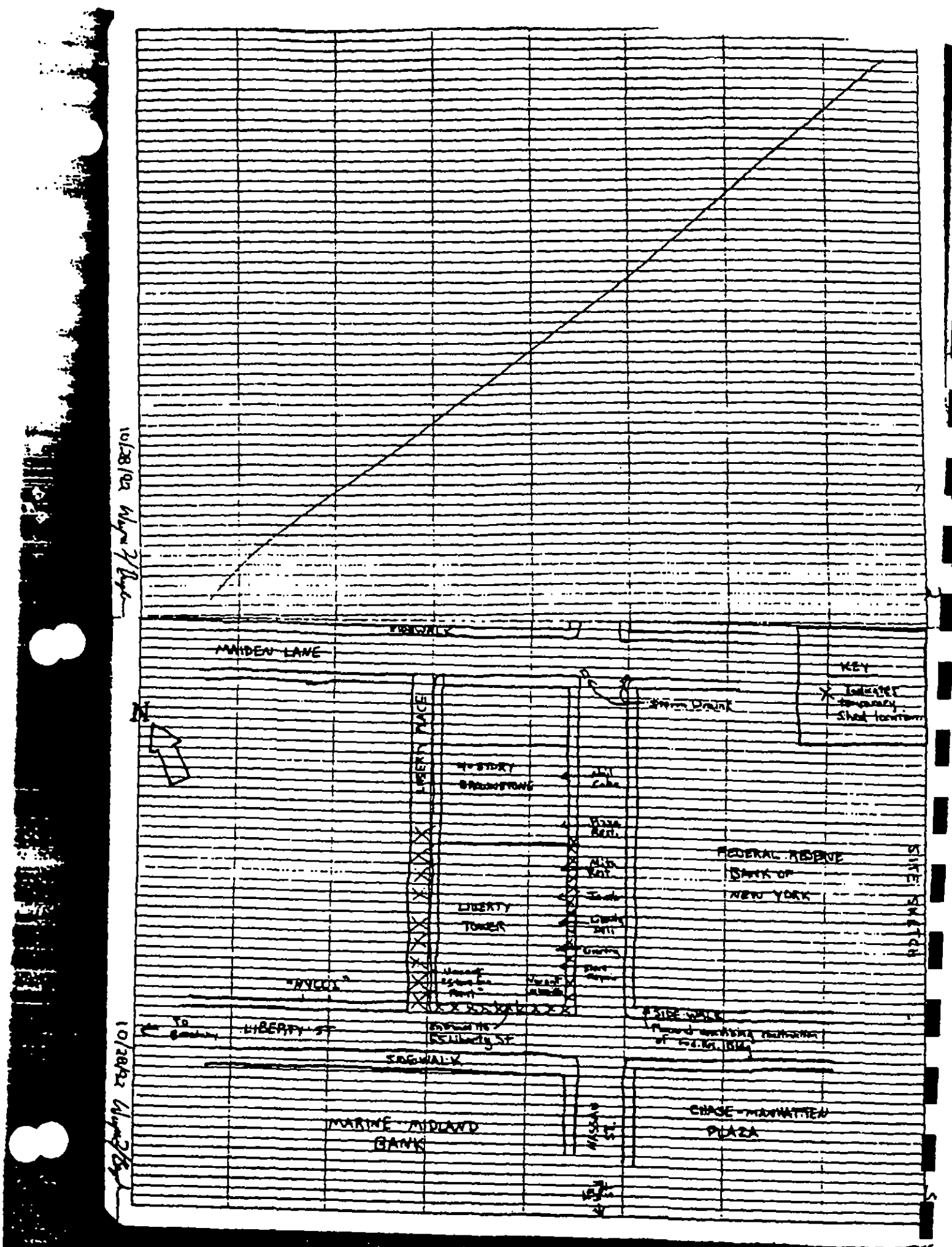
5-9	OFF-SITE RECONNAISSANCE FIELD NOTES
10	BLANK PAGE

10/28/92


10/28/82 Wayne Ryder
SIDEWALK
MAIDEN LANE
KEY
X Indicates temporary shed location
Storm Drain
LIBERTY PLACE
40-STORY BRICK/STONE
Duct Cover
Water Vault
Manhole
Catch Basin
Curb Cut
Granite
Steel Plate
LIBERTY TOWER
FEDERAL RESERVE BANK OF NEW YORK
NASSAU ST.
"NYCTA"
Manhole
Catch Basin
Steel Plate
LIBERTY ST
SIDEWALK
MARINE MIDLAND BANK
WILLIAM ST.
CHASE-MANHATTEN PLAZA
10/28/82 Wayne Ryder

0740 Malcolm Pirnie personnel Wayne [illegible] and Alfred Conklin arrive on-site.

"Weather: Mild Clear Sunny, light breeze. Temperature approximately 45°F.

0745 Alfred Conklin left site area, W. Bugden and L. Szeged remain to perform off-site recon.

The building is approximately 25 stories high. The placard on the front of the building reads, "Liberty Tower" and the date of construction is 1909, with 1979 listed as the date of restoration.

The building is presently undergoing additional work, with the permit posted on the front entrance listing the work as "To erect a temp. scaffold support structure at roof as per DWGS. 21-89-090-" issued by City of New York Dept. of Buildings. An additional Dept. of Buildings permit reads "Installation of shed 155 feet on Nassau St., 108 ft on Liberty St., 15 ft around corner during facade repair. No change in use, egress or occupancy." The two permits are numbered P0005157 and P0001650, respectively.

An additional card in front entrance window is from the Landmarks Preservation Commission (City of NY) and states only "Permit for Minor Work", permit number 92-0709.

Both Dept. of Buildings permits list the "Use" of

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10/28/92 Wayne Bugden

the s[illegible] as "Residence Buildings".

1755 Presently the building has a shed erected on Liberty and Nassau streets and around the corner to the west side of the building in narrow alley. The southwest corner of the building is vacant on the ground floor, with a sign stating "Store for Rent: Sylvan Lawrence Co. Real Estate". Above is a sign reading "Chef's Palace". In the Center of Building facing south are ornate glass doors facing onto Liberty Street. On the Southeast corner of building the ground floor is vacant and construction debris - mostly wood is visible through window.

The entire area is paved, with concrete slab sidewalks out to the curb where Liberty and Nassau Streets are paved with asphalt.

Directly across Liberty street is a modern high rise office complex. Diagonally across the intersection of Liberty and Nassau (SE of Liberty Tower) is another modern office building with a sign indicating the headquarters of Chase Manhattan bank.

To the West of Liberty Tower, [illegible] directly across narrow alley is a Gothic architecture, marble building, whose ground floor is vacant and undergoing construction. The sign on its front floor

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read "NYCCI"

0800 Liberty Tower continues along Nassau Street including the address of 45 Nassau Street, which is the "Mita Restaurant". Other businesses on the ground floor of Liberty Tower, Nassau Street include "Liberty Locksmiths Inc" (vacant), "Liberty Shoe Repair" (vacant), a vacant drivery, an open deli ("Liberty Deli"), and a vacant jeweler.

Across Nassau Street from Liberty Tower is a stone structure housing the Federal Reserve Bank. This building is made of Limestone and Sandstone and lies due East of Liberty Tower.

The land in this area appears to slope East along Liberty Street and at a slightly steeper grade, North along Nassau St. and the narrow alley way.

North of Liberty Tower is a 4 story brownstone building which directly abuts Liberty Tower. It houses a Pizza Restaurant and Nail Salon on the Ground floor, facing East onto Nassau Street.

The Federal Reserve Bank on the NE corner of Liberty and Nassau Street has a placard which reads "Five stories are below street level with subterranean vaults resting on bedrock." There is another placard designating the Federal Reserve Bank building as a "Designated Landmark, New York City".

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